# **EXHIBIT 1**

## WILLCOX & SAVAGE, P.C. TIME ENTRIES IN THE PROSECUTION OF COURTHOUSE NEWS SERVICE V. GEORGE E. SCHAEFER, ET AL.

04/05/18 Review email from Mr. Hibsher and review previous data from

Mr. Abbott;

C.M. SHUMADINE

0.10 hr.

04/17/18 Email from Mr. Hibsher re: July schedule and response and

additional email to Mr. Hibsher:

C.M. SHUMADINE

0.10 hr.

#### **April 2018 Summary of Fees**

C.M. SHUMADINE: 0.20 hr. @ \$450/hr. \$ 90.00

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06/27/18 Conference call with Mr. Hibsher and Ms. Goldman re: issues

in proceeding;

C.M. SHUMADINE 0.20 hr.

## **June 2018 Summary of Fees**

C.M. SHUMADINE: 0.20 hr. @ \$450/hr. \$ 90.00

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07/08/18 Review draft pleadings sent by Mr. Hibsher and make a

preliminary analysis of such pleadings;

C.M. SHUMADINE 0.80 hr.

07/09/18 Review drafts of various pleadings sent by Mr. Hibsher, including

drafts of complaint, memorandum of law and declarations;

C.M. SHUMADINE 1.70 hr.

07/09/18 Email to Mr. Hibsher with initial comments;

C.M. SHUMADINE 0.20 hr.

07/09/18 Email from and to Mr. Hibsher and research re: access to filings

through OCRA and delays associated with such access;

0.40 hr. C.M. SHUMADINE 07/10/18 Email to Mr. Hibsher following up on the concerns in regard to the pleadings; 1.90 hr. C.M. SHUMADINE 07/10/18 Email to Mr. Hibsher following up on the concerns in regard to the pleadings; 0.20 hr. C.M. SHUMADINE 07/11/18 Email from Mr. Harrison and email to Mr. Hibsher, et al., re: issues in regard to proposed filing; C.M. SHUMADINE 0.20 hr. 07/11/18 Review cases cited in memorandum; C.M. SHUMADINE 0.50 hr. 07/11/18 Email from Ms. Goldman and review of revised drafts of pleadings; C.M. SHUMADINE 0.70 hr. Continue review of draft pleadings and analyze issues related 07/11/18 to draft pleadings and review the factual allegations; C.M. SHUMADINE 1.30 hr. 07/12/18 Review cases cited in brief; 0.70 hr. C.M. SHUMADINE 07/12/18 Continue review and analysis of draft pleadings, including the declarations and review facts set forth in declarations; C.M. SHUMADINE 1.10 hr. 07/12/18 Email from Ms. Goldman and response re: her questions regarding local procedure; C.M. SHUMADINE 0.20 hr. 07/12/18 Email from Mr. Hibsher, et al., re: local procedure in regard to obtaining a preliminary injunction;

	C.M. SHUMADINE	0.30 hr.	
07/13/18	Prepare for conference call related to procedure;	o filing lawsuit and	
	C.M. SHUMADINE	0.30 hr.	
07/13/18	Review revised draft pleadings and o	eases cited;	
	C.M. SHUMADINE	1.20 hr.	
07/13/18	Email to Ms. Goldman with form of	motions;	
	C.M. SHUMADINE	0.10 hr.	
07/13/18	Conference call with Mr. Hibsher an issues in case and local procedure;	d Ms. Goldman re:	
	C.M. SHUMADINE	0.40 hr.	
07/14/18	Review revised draft of pleadings;		
	C.M. SHUMADINE	0.90 hr.	
07/14/18	Emails to Ms. Goldman re: formattir	ng and local issues;	
	C.M. SHUMADINE	0.20 hr.	
07/15/18	Review revised draft of pleadings;		
	C.M. SHUMADINE	0.30 hr.	
07/15/18	Emails to Ms. Goldman re: additional questions re: local practice;		
	C.M. SHUMADINE	0.20 hr.	
07/16/18	Review draft pleadings and continue draft pleadings;	d revisions to	
	C.M. SHUMADINE	0.80 hr.	
07/16/18	Email from Ms. Goldman re: revised of revised Complaint;	Complaint and review	
	C.M. SHUMADINE	0.30 hr.	

07/16/18	Email to and from Ms. Goldman re: revised Complaint and her questions re: local practice in formatting Complaint;	
	C.M. SHUMADINE	0.20 hr.
07/16/18	Send documents to Clerks;	
	C.M. SHUMADINE	0.10 hr.
07/17/18	Review additional revisions to draft for filing;	pleadings re: preparation
	C.M. SHUMADINE	0.50 hr.
07/18/18	Review revised draft pleadings;	
	C.M. SHUMADINE	0.40 hr.
07/18/18	Prepare for conference call with Mr. Hibsher, Ms. Goldman, Mr. Harrison re: pleadings and procedure;	
	C.M. SHUMADINE	0.70 hr.
07/18/18	Email from Mr. Hibsher re: attorney's fees;	
	C.M. SHUMADINE	0.10 hr.
07/18/18	Email to Mr. Hibsher re: issues regarding attorney's fees in the Eastern District of Virginia;	
	C.M. SHUMADINE	0.10 hr.
07/19/18	Email from Ms. Goldman re: corporate disclosure statement;	
	C.M. SHUMADINE	0.10 hr.
07/19/18	Email from Ms. Goldman with finals	s of Declarations;
	C.M. SHUMADINE	0.10 hr.
07/19/18	Review finals of the Declarations;	
	C.M. SHUMADINE	0.30 hr.
07/19/18	Email from Ms. Goldman with finals	s of Complaint;

	C.M. SHUMADINE	0.10 hr.
07/19/18	Review Complaint;	
	C.M. SHUMADINE	0.90 hr.
07/19/18	Review issues re: the filing procedur filings in the case;	e in regard to the
	C.M. SHUMADINE	0.20 hr.
07/20/18	Telephone conference with Mr. Hibs	sher;
	C.M. SHUMADINE	0.10 hr.
07/20/18	Review filing on PACER;	
	C.M. SHUMADINE	0.20 hr.
07/20/18	Email to Mr. Larsen re: conference of	eall;
	C.M. SHUMADINE	0.10 hr.
07/20/18	Additional telephone conference with issues in conference call;	h Mr. Hibsher re:
	C.M. SHUMADINE	0.10 hr.
07/20/18	Email re: judge selected;	
	C.M. SHUMADINE	0.10 hr.
07/20/18	Email to Mr. Larsen re: relief reques	ted in lawsuit;
	C.M. SHUMADINE	0.10 hr.
07/20/18	Letter to process server re: service;	
	C.M. SHUMADINE	0.10 hr.
07/20/18	Review possible suggestions to Mr. I with providing immediate access;	Larsen to comply
	C.M. SHUMADINE	0.30 hr.
07/20/18	Voicemail from Mr. Larsen;	

	C.M. SHUMADINE	0.10 hr.
07/20/18	Telephone conference with Mr. Hibsher's office;	
	C.M. SHUMADINE	0.10 hr.
07/20/18	Locate process servers in Prince Wildocuments on the Clerk of the Circu	<u> </u>
	P. YODER	0.30 hr.
07/23/18	Email to Mr. Larsen re: telephone ca	all;
	C.M. SHUMADINE	0.10 hr.
07/23/18	Email from and to Mr. Hibsher re: the	he call;
	C.M. SHUMADINE	0.10 hr.
07/23/18	Conference call with Mr. Hibsher and Mr. Larsen and analysis of issues re: conference call;	
	C.M. SHUMADINE	0.20 hr.
07/23/18	Analyze issues raised by Mr. Larsen and email to Mr. Hibsher, et al., re: how to deal with the issues;	
	C.M. SHUMADINE	0.50 hr.
07/23/18	Email from Mr. Hibsher responding CNS's positions;	re: facts supporting
	C.M. SHUMADINE	0.10 hr.
07/24/18	Analyze issues relating to Mr. Larsen's comments and review how to resolve factual disputes prior to a hearing;	
	C.M. SHUMADINE	0.60 hr.
07/27/18	Review notice of returned summons filed on PACER;	for Mr. Schaefer
	C.M. SHUMADINE	0.10 hr.
07/27/18	Telephone conference with Mr. Fior request for additional time;	rello re: Mr. Schaefer's

	C.M. SHUMADINE	0.10 hr.
07/27/18	Telephone conference with Mr. Hibsher's office and voicemail to Mr. Hibsher;	
	C.M. SHUMADINE	0.10 hr.
07/27/18	Telephone conference with Mr. Hibsher re: Mr. Fiorello's request;	
	C.M. SHUMADINE	0.20 hr.
07/30/18	Email from Mr. Hibsher re: extension;	
	C.M. SHUMADINE	0.10 hr.
07/30/18	Review file and email to Mr. Hibsher re: extension and issues regarding counsel for the clerks;	

## **July 2018 Summary of Fees**

0.10 hr.

	<u>Hours</u>	Rate/Hr	<u>Amount</u>
C.M. SHUMADINE	22.30	450.00	10,035.00
P. YODER	0.30	155.00	46.50
TOTAL	22.60		\$10,081.50

## **July 2018 Fees for Professional Services**

C.M. SHUMADINE

\$10,081.50

08/02/18	Telephone conference with Mr. Hibs with Mr. Prince and review file;	sher re: call
	C.M. SHUMADINE	0.30 hr.
08/02/18 Conference call with Mr. Prince, M		. Hibsher, et al.;
	C.M. SHUMADINE	0.50 hr.
08/02/18	Telephone conference with Mr. Hibs conference call with Mr. Prince, et a	
	C.M. SHUMADINE	0.20 hr.

08/02/18	Email from Mr. Hibsher to Mr. Prince and response from Mr. Prince re: agreement to briefing schedule;	
	C.M. SHUMADINE	0.10 hr.
08/02/18	Analyze issues raised by Mr. Prince conference call re: delays;	in the
	C.M. SHUMADINE	0.20 hr.
08/03/18	Email from Mr. Hibsher, et al., re: Judge Morgan's schedule;	
	C.M. SHUMADINE	0.10 hr.
08/06/18	Telephone conference with Mr. Hibs and issues in case and local practice;	
	C.M. SHUMADINE	0.20 hr.
08/06/18	Email to Mr. Prince and response re: motion for extension and to set a briefing schedule;	
	C.M. SHUMADINE	0.10 hr.
08/07/18	Review email from Mr. Prince and email to Mr. Hibsher re: scheduling;	
	C.M. SHUMADINE	0.10 hr.
08/07/18	Review draft motion and order and email to Mr. Prince approving form re: schedule;	
	C.M. SHUMADINE	0.10 hr.
08/07/18	Follow-up email from Mr. Prince re: signatures;	
	C.M. SHUMADINE	0.10 hr.
08/08/18	Telephone conference with Mr. Hibsher re: call with courtroom deputy;	
	C.M. SHUMADINE	0.10 hr.
08/08/18	Email from Mr. Hibsher re: call to c	ourtroom deputy;

0.10 hr. C.M. SHUMADINE 08/08/18 Email responding to Mr. Hibsher's questions concerning call to courtroom deputy; 0.10 hr. C.M. SHUMADINE 08/08/18 Email from Mr. Harrison containing questions re: local practice; C.M. SHUMADINE 0.10 hr. 08/08/18 Investigate and review law re: Mr. Harrison's questions; C.M. SHUMADINE 0.20 hr. 08/08/18 Email to Mr. Harrison responding to the questions raised; C.M. SHUMADINE 0.20 hr. 08/08/18 Email from and to Mr. Prince re: call to courtroom deputy; C.M. SHUMADINE 0.10 hr. 08/08/18 Additional email from Mr. Prince and Mr. Hibsher re: call and local practice; 0.10 hr. C.M. SHUMADINE 08/09/18 Email from Mr. Hibsher and response and follow-up email re: call with courtroom deputy and re: scheduling issues; C.M. SHUMADINE 0.20 hr. 08/10/18 Email from Mr. Prince re: hearing; C.M. SHUMADINE 0.10 hr. 08/10/18 Email responding to Mr. Prince; C.M. SHUMADINE 0.10 hr. 08/10/18 Email to Mr. Hibsher re: Ms. Smith's condition and an analysis of issues relating to Ms. Smith's need to attend hearing; C.M. SHUMADINE 0.20 hr.

08/10/18	Email from Mr. Prince and Mr. Hibsher re: scheduling;	
	C.M. SHUMADINE	0.10 hr.
08/10/18	Email from Mr. Hibsher and respons	e re: scheduling;
	C.M. SHUMADINE	0.10 hr.
08/13/18	Research re: venue issues raised by I	Mr. Prince;
	C.M. SHUMADINE	0.40 hr.
08/13/18	Telephone conference with Mr. Hibs	sher re: schedule;
	C.M. SHUMADINE	0.20 hr.
08/13/18	Conference call with Mr. Prince and issues involving schedule and setting	
	C.M. SHUMADINE	0.20 hr.
08/13/18	Conference call to Judge Morgan's c	ourtroom deputy's office;
	C.M. SHUMADINE	0.20 hr.
08/13/18	Email from and to Mr. Hibsher re: po	ersonal liability of clerk;
	C.M. SHUMADINE	0.10 hr.
08/13/18	Research re: personal liability of cler risk management procedures;	k under Virginia
	C.M. SHUMADINE	0.90 hr.
08/14/18	Research re: personal responsibility judgment is rendered for attorneys' f	2
	C.M. SHUMADINE	0.90 hr.
08/14/18	Email to Mr. Hibsher re: personal re	sponsibility of clerks;
	C.M. SHUMADINE	0.10 hr.
08/14/18	Email from and to Mr. Prince re: sch	edule;
	C.M. SHUMADINE	0.10 hr.

08/14/18	Email to Mr. Hibsher re: risk management and response from Mr. Hibsher;	
	C.M. SHUMADINE	0.10 hr.
08/15/18	Research re: risk management and personal liability of clerks if any award is made of attorneys' fees;	
	C.M. SHUMADINE	0.90 hr.
08/15/18	Email to Mr. Hibsher re: personal lia	bility of clerks;
	C.M. SHUMADINE	0.20 hr.
08/15/18	Telephone conference with Mr. Princand attempted conference call to Ms.	
	C.M. SHUMADINE	0.20 hr.
08/15/18	Follow-up telephone conference with Mr. Prince and Mr. Hibsher re: scheduling issues;	
	C.M. SHUMADINE	0.10 hr.
08/15/18	Email to and from Mr. Hibsher re: risk management's position;	
	C.M. SHUMADINE	0.10 hr.
08/16/18	Review Yamasaki opinion and email to Mr. Hibsher re: issues raised by opinion;	
	C.M. SHUMADINE	0.30 hr.
08/17/18	Email from Mr. Hibsher responding to email and raising issues re: discovery;	
	C.M. SHUMADINE	0.10 hr.
08/17/18	Follow-up email to and from Mr. Hil	bsher;
	C.M. SHUMADINE	0.10 hr.
08/17/18	Telephone conference with Ms. Bax	ter re: scheduling the hearing;

	C.M. SHUMADINE	0.10 hr.
08/17/18	Email to Mr. Prince and Mr. Hibsher re: schedule;	
	C.M. SHUMADINE	0.10 hr.
08/17/18	Email from and to Mr. Hibsher re: se	cheduling;
	C.M. SHUMADINE	0.10 hr.
08/20/18	Email from Ms. Baxter re: not setting	g hearing;
	C.M. SHUMADINE	0.10 hr.
08/20/18	Email to Mr. Hibsher and Mr. Prince	e re: Ms. Baxter's email;
	C.M. SHUMADINE	0.10 hr.
08/20/18	Email to Mr. Hibsher re: contact wit	h Ms. Baxter;
	C.M. SHUMADINE	0.10 hr.
08/23/18	Preliminary review of filings made by clerks;	
	C.M. SHUMADINE	0.30 hr.
08/24/18	Continued review of memorandum i exhibits;	n support of motion to dismiss and
	C.M. SHUMADINE	1.10 hr.
08/24/18	Review Rule 26(f) order;	
	C.M. SHUMADINE	0.20 hr.
08/24/18	Telephone conference with Mr. Hibsher re: issues raised in memoranda;	
	C.M. SHUMADINE	0.10 hr.
08/24/18	Review corrected filings;	
	C.M. SHUMADINE	0.20 hr.
08/24/18	Email to Mr. Hibsher re: Rule 26(f) order;	
	C.M. SHUMADINE	0.10 hr.

08/24/18	Email from Mr. Prince re: his unavailability for a Rule 26(f) conference;	
	C.M. SHUMADINE	0.10 hr.
08/27/18	Email from and to Mr. Hibsher re: ca	all to Ms. Baxter;
	C.M. SHUMADINE	0.10 hr.
08/27/18	Analyze issues related to the need for obtain facts for the hearing and what	•
	C.M. SHUMADINE	0.80 hr.
08/28/18	Analyze facts relating to access in the and email to Mr. Hibsher;	e Norfolk Courthouse
	C.M. SHUMADINE	0.40 hr.
08/28/18	Email from Mr. Hibsher re: issues regarding factual allegations;	
	C.M. SHUMADINE	0.10 hr.
08/28/18	Review clerks' statements re: local procedures and analyze how to counter those allegations;	
	C.M. SHUMADINE	0.40 hr.
08/29/18	Email from Mr. Hibsher and review of motion and order re: extension requested by Courthouse News;	
	C.M. SHUMADINE	0.20 hr.
08/29/18	Email to Mr. Prince, et al., with draft pleadings;	
	C.M. SHUMADINE	0.10 hr.
08/29/18	Email from Mr. Prince approving dra	aft pleadings;
	C.M. SHUMADINE	0.10 hr.
08/29/18	File motion for extension;	
	C.M. SHUMADINE	0.10 hr.
08/30/18	Email from Ms. Goldman re: issues i	regarding local

practice and questions;

C.M. SHUMADINE

0.10 hr.

08/30/18 Email to and

Email to and from Ms. Goldman re: discovery;

C.M. SHUMADINE

0.20 hr.

08/30/18

Review memoranda and exhibits filed by clerks in light of the conversation with Mr. Hibsher and consider how to obtain information regarding the facts;

C.M. SHUMADINE

0.90 hr.

08/31/18

09/02/18

Email from and to Ms. Goldman re: discovery and

comments re: discovery;

C.M. SHUMADINE

0.70 hr.

### **August 2018 Summary of Fees**

C.M. SHUMADINE: 15.90 hrs. @ \$450/hr.

\$7,155.00

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Email to Ms. Goldman transmitting prior discovery and outlining issues re: third party discovery;

C.M. SHUMADINE

0.30 hr.

09/04/18 Email from Mr. Hibsher re: possible settlement and

analyze and review issues related to settlement;

C.M. SHUMADINE

0.20 hr.

09/05/18 Analyze issue of retained jurisdiction to enforce settlements;

C.M. SHUMADINE

0.40 hr.

09/05/18 Email to Mr. Hibsher re: retained jurisdiction to enforce

settlements;

C.M. SHUMADINE

0.10 hr.

09/05/18 Telephone conference with Mr. Hibsher re: issues in

case and discovery and re: retained jurisdiction;

C.M. SHUMADINE 0.20 hr. 09/05/18 Research re: efiling procedures in Norfolk Circuit Court and telephone calls to other law firms; C.M. SHUMADINE 0.80 hr. 09/06/18 Telephone conference with office of Mr. Lotkin at Rutter Mills re: efiling procedures: 0.20 hr. C.M. SHUMADINE 09/06/18 Telephone conference with Mr. Lotkin's paralegal re: efiling procedures used by Rutter Mills; C.M. SHUMADINE 0.20 hr. 09/06/18 Email to Mr. Hibsher, et al., re: investigation; C.M. SHUMADINE 0.20 hr. 09/06/18 Continue investigation and review the factual claims made by the clerks and continued telephone calls to other law firms; C.M. SHUMADINE 0.80 hr. 09/07/18 Email from Mr. Hibsher re: local practice; C.M. SHUMADINE 0.10 hr. Email responding to Mr. Hibsher's questions re: local practice; 09/07/18 0.20 hr. C.M. SHUMADINE 09/07/18 Follow-up emails from and to Mr. Hibsher re: local practice and re: issues in case; C.M. SHUMADINE 0.20 hr. 09/07/18 Email from and to Mr. Hibsher re: procedures in the Eastern District of Virginia Clerk's Office; C.M. SHUMADINE 0.20 hr. 09/10/18 Telephone call from Mr. Harrison and Mr. Hibsher re:

Rule 26(f)	conference;

C.M. SHUMADINE

0.30 hr.

09/10/18 Review pleadings and local rules re: potential issues in case;

C.M. SHUMADINE

0.30 hr.

09/10/18 Continue factual investigation re: electronic filing in Virginia

and telephoning other law firms re: their experience;

C.M. SHUMADINE

0.60 hr.

09/11/18 Prepare for Rule 26(f) conference;

C M SHUMADINE

0.20 hr.

09/11/18 Email from Mr. Harrison with draft of response to motion

to dismiss and analyze draft of response;

C.M. SHUMADINE

1.30 hr.

09/11/18 Email from Mr. Hibsher re: settlement discussions

and discovery issues;

C.M. SHUMADINE

0.10 hr.

09/11/18 Analyze Mr. Hibsher's questions and email responding

to his questions;

C.M. SHUMADINE

0.30 hr.

09/11/18 Rule 26(f) conference by telephone with Mr. Prince and

Mr. Hibsher;

C.M. SHUMADINE

0.30 hr.

09/11/18 Telephone conference with Ms. Baxter and email to

Mr. Hibsher, Mr. Harrison and Mr. Prince re: telephone call;

C.M. SHUMADINE

0.10 hr.

09/11/18 Telephone conference with Clerk's Office and

follow-up check with Clerk at Clerk's Office re:

Ms. Baxter's availability;

	C.M. SHUMADINE	0.10 hr.
09/11/18	Email to Mr. Hibsher concerning Ms	Baxter's unavailability;
	C.M. SHUMADINE	0.10 hr.
09/11/18	Review email analyzing Rule 26(f) c by Mr. Harrison;	onference prepared
	C.M. SHUMADINE	0.20 hr.
09/12/18	Review documents to be filed and an in documents;	alyze the information
	C.M. SHUMADINE	0.40 hr.
09/12/18	Continue investigation of local practice electronic filings by telephoning other	
	C.M. SHUMADINE	0.20 hr.
09/12/18	Email from Mr. Harrison re: the clos in light of weather;	ure of the court
	C.M. SHUMADINE	0.10 hr.
09/12/18	Email to Mr. Hibsher, et al., re: issue	es re: filing;
	C.M. SHUMADINE	0.10 hr.
09/12/18	Email to Mr. Hibsher, et al., re: issue	es re: filing;
	C.M. SHUMADINE	0.10 hr.
09/13/18	Email from and to Ms. Goldman re:	filing;
	C.M. SHUMADINE	0.10 hr.
09/13/18	Review and file brief in opposition to	o motion to dismiss;
	C.M. SHUMADINE	0.70 hr.
09/13/18	Review email from Ms. Goldman re: analyze issues on which Ms. Goldma	<u>-</u>
	C.M. SHUMADINE	0.70 hr.

09/15/18	Review email from Mr. Prince responding to Rule 26f conference issues;	
	C.M. SHUMADINE	0.20 hr.
09/15/18	Email to all re: trial time estimates;	
	C.M. SHUMADINE	0.10 hr.
09/17/18	Email from and to Mr. Hibsher re: le	ngth of trial;
	C.M. SHUMADINE	0.10 hr.
09/17/18	Email from and to Mr. Hibsher re: le re: proposed order;	tter to OES and
	C.M. SHUMADINE	0.10 hr.
09/17/18	Review proposed letter to OES;	
	C.M. SHUMADINE	0.20 hr.
09/17/18	Review sketch of order;	
	C.M. SHUMADINE	0.20 hr.
09/17/18	Email to Mr. Hibsher and response re	e: proposed order;
	C.M. SHUMADINE	0.10 hr.
09/17/18	Email to and from Mr. Hibsher re: iss venue if Mr. Schaefer is dismissed;	sues regarding
	C.M. SHUMADINE	0.10 hr.
09/17/18	Review summary of Seventh Circuit to and from Mr. Hibsher re: the Seve	_
	C.M. SHUMADINE	0.20 hr.
09/17/18	Email from Mr. Hibsher and responsere: meeting between reporter and edit Norfolk Circuit Court Clerk;	
	C.M. SHUMADINE	0.10 hr.
09/18/18	Email from Mr. Prince and Mr. Hibsl	her re: meeting

with Mr. Scha	aefer and con	nfirming details;
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C.M. SHUMADINE

0.10 hr.

09/18/18 Email to Mr. Hibsher re: the timing of initial disclosures;

C.M. SHUMADINE

0.10 hr.

09/18/18 Email from and to Mr. Hibsher re: the Eastern District

of Virginia Clerk's Office;

C.M. SHUMADINE

0.10 hr.

09/18/18 Email from Mr. Hibsher to Mr. Prince re: settlement

proposal and analyze settlement proposal;

C.M. SHUMADINE

0.10 hr.

09/19/18 Email from Mr. Hibsher to Mr. Prince extending

deadline for initial disclosures;

C.M. SHUMADINE

0.10 hr.

09/19/18 Review Clerks' request for oral argument of motion

to dismiss;

C.M. SHUMADINE

0.10 hr.

09/19/18 Email to Mr. Hibsher, et al., re: Clerk's request for

oral argument;

C.M. SHUMADINE

0.10 hr.

09/20/18 Review revised Rule 26f notes proposed by Mr. Harrison;

C.M. SHUMADINE

0.20 hr.

09/20/18 Analyze factual claims raised by clerks and review OES's

website re: claims made by clerks in their declarations;

C.M. SHUMADINE

0.40 hr.

09/24/18 Email from Ms. Goldman with draft deposition notices

and review of notices;

C.M. SHUMADINE

0.20 hr.

09/24/18	Email to Ms. Goldman and arrange for a conference room for deposition;	
	C.M. SHUMADINE	0.10 hr.
09/25/18	Review email from Mr. Hibsher to M settlement of Schaefer case and analyses	
	C.M. SHUMADINE	0.20 hr.
09/25/18	Follow-up email from Ms. Goldman	re: depositions;
	C.M. SHUMADINE	0.10 hr.
09/25/18	Email from Mr. Hibsher to Mr. Princ conference room for new proposed d	
	C.M. SHUMADINE	0.10 hr.
09/25/18	Review declarations of clerks re: fac	tual issues in dispute;
	C.M. SHUMADINE	0.10 hr.
09/26/18	Email from and to Ms. Goldman re: oral argument;	letter to OES and
	C.M. SHUMADINE	0.20 hr.
09/26/18	Prepare letter to OES with attachmen	nts to be sent;
	C.M. SHUMADINE	0.20 hr.
09/26/18	Follow-up email from and to Ms. Go changing the proposed letter to the C	
	C.M. SHUMADINE	0.10 hr.
09/26/18	Review and revise new draft of letter	r to OES and Mr. Hade;
	C.M. SHUMADINE	0.20 hr.
09/26/18	Additional email re: changes to lette	r to Mr. Hade;
	C.M. SHUMADINE	0.10 hr.
09/26/18	Send letter to Mr. Hade;	

C.M. SHUMADINE 0.10 hr.

09/27/18 Review reply memorandum in support of motion to dismiss;

C.M. SHUMADINE

0.40 hr.

09/27/18 Review draft settlement agreement and stipulated

order of dismissal;

C.M. SHUMADINE

0.50 hr.

09/27/18 Email re: venue of settlement is implemented and

analysis of the effect of settlement on the remaining litigation;

C.M. SHUMADINE

0.20 hr.

09/27/18 Review objections to discovery filed by clerks and analyze

objections;

C.M. SHUMADINE

0.30 hr.

## September 2018 Summary of Fees

C.M. SHUMADINE: 16.20 hrs. @ \$450/hr. \$7,290.00

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10/01/18 Email from and to Ms. Bryan re: local rules re:

discovery and objections;

C.M. SHUMADINE 0.20 hr.

10/02/18 Email from Mr. Harrison re: sealing complaints;

C.M. SHUMADINE 0.10 hr.

10/02/18 Research and email to Mr. Harrison re: law in

Virginia regarding sealing any documents filed with Court;

C.M. SHUMADINE 0.70 hr.

10/02/18 Email from Mr. Harrison re: settlement;

C.M. SHUMADINE 0.10 hr.

10/02/18 Prepare email responding to Mr. Harrison's questions

regarding settlement and research re: experience of other

	lawyers re: settlement agreements;	
	C.M. SHUMADINE	0.30 hr.
10/03/18	Email from and to Ms. Goldman re:	protective order;
	C.M. SHUMADINE	0.10 hr.
10/03/18	Telephone conference with Ms. Mcc exemplars of protective orders;	Cloud re: obtaining
	C.M. SHUMADINE	0.10 hr.
10/03/18	Review plaintiff's initial disclosures	,
	C.M. SHUMADINE	0.20 hr.
10/03/18	Email from Ms. Goldman re: initial	disclosures;
	C.M. SHUMADINE	0.10 hr.
10/03/18	Review clerks' initial disclosures;	
	C.M. SHUMADINE	0.20 hr.
10/03/18	Review email from Mr. Harrison an related to initial disclosures;	d analyze issues
	C.M. SHUMADINE	0.20 hr.
10/04/18	Review email from Mr. Prince and I to discuss discovery issues;	Mr. Hibsher re: call
	C.M. SHUMADINE	0.10 hr.
10/04/18	Email from and to Ms. Goldman re: to call with Mr. Prince;	call preliminary
	C.M. SHUMADINE	0.10 hr.
10/04/18	Prepare for and participate in call war. Goldman and Mr. Harrison recto be raised with Mr. Prince;	

C.M. SHUMADINE

0.40 hr.

10/04/18	Research and discussions with litigators re: filing sealed complaints in state court with which none had any experience;	
	C.M. SHUMADINE	0.50 hr.
10/04/18	Follow-up discussion and research redocuments with complaint;	e: filing sealed
	C.M. SHUMADINE	0.30 hr.
10/04/18	Email to Mr. Harrison re: advice that documents with complaints would be	•
	C.M. SHUMADINE	0.10 hr.
10/05/18	Review email from Mr. Hibsher to M	Ir. Prince re: settlement;
	C.M. SHUMADINE	0.10 hr.
10/05/18	Review revisions to settlement agreement and analyze issues raised by revisions;	
	C.M. SHUMADINE	0.30 hr.
10/05/18	Prepare for conference call and participate in conference call re: discovery and settlement with Mr. Prince, Mr. Hibsher, Mr. Harrison and Ms. Goldma:	
	C.M. SHUMADINE	0.90 hr.
10/05/18	Analyze cases re: access to complain basis;	its on contemporaneous
	C.M. SHUMADINE	0.50 hr.
10/05/18	Telephone call from Ms. Myers of Attorney General's Office re: letter to OES;	
	C.M. SHUMADINE	0.50 hr.
10/05/18	Review OES manuals and response to	to Ms. Myers' call;
	C.M. SHUMADINE	0.20 hr.
10/05/18	Email from Mr. Prince re: Mr. Schae	fer's unavailability

for depositions on November 6 and raising questions about other depositions;

C.M. SHUMADINE

0.10 hr.

10/06/18 Email from and to Mr. Hibsher and follow-up email

re: telephone call with Ms. Myers from the Virginia Attorney General's Office;

Attorney General's Office

C.M. SHUMADINE

0.10 hr.

10/07/18 Email to Mr. Hibsher, et al., re: arrangements for

depositions requested by Mr. Prince;

C M SHUMADINE

0.10 hr.

10/07/18 Email from Ms. Goldman re: conference call with

Ms. Myers and prepare for conference call with Ms. Myers;

C.M. SHUMADINE

0.30 hr.

10/08/18 Prepare for conference call re: telephone call from Ms. Myers

of Attorney General's Office re: OES and conference call

with Mr. Hibsher, Mr. Harrison and Ms. Goldman;

C.M. SHUMADINE

0.40 hr.

10/08/18 Email from and to Mr. Harrison re: issues regarding

follow-up to Ms. Myers' call;

C.M. SHUMADINE

0.20 hr.

10/08/18 Review email from Mr. Prince and draft protective

order and email to Mr. Hibsher, et al., re: observations

regarding the protective order;

C.M. SHUMADINE

0.30 hr.

10/09/18 Email from Mr. Prince with revisions to proposed

settlement agreement for Mr. Schaefer;

C.M. SHUMADINE

0.30 hr.

10/09/18 Email from and to Ms. Goldman re: draft of

protective order;

0.20 hr. C.M. SHUMADINE 10/09/18 Email from Ms. Goldman re: discovery and arrange conference rooms for Ms. Goldman to take depositions; C.M. SHUMADINE 0.20 hr. 10/09/18 Email re: further contact with Ms. Myers; C.M. SHUMADINE 0.10 hr. Email to and from Mr. Harrison re: interview with 10/09/18 Ms. Myers; C.M. SHUMADINE 0.20 hr. 10/09/18 Review OES manual and declarations of clerks; C.M. SHUMADINE 0.30 hr. 10/10/18 Review email from Mr. Prince and reply re: protective order; C.M. SHUMADINE 0.20 hr. 10/10/18 Email from Mr. Hibsher granting Mr. Prince an extension for responding to discovery: C.M. SHUMADINE 0.10 hr. 10/10/18 Email from Ms. Goldman re: questions concerning procedure in light of the absence of a Rule 16(b) conference; C.M. SHUMADINE 0.10 hr. 10/10/18 Telephone conference with Ms. Goldman re: her questions regarding procedure and discovery; C.M. SHUMADINE 0.30 hr. 10/10/18 Email from Ms. Goldman to Mr. Prince and from Mr. Prince to Ms. Goldman re: conference on discovery and re: issues regarding the protective order;

0.10 hr.

C.M. SHUMADINE

10/11/18	Email from Ms. Goldman re: discovery issues;	
	C.M. SHUMADINE	0.10 hr.
10/11/18	Email from Mr. Harrison re: issues re: summary judgment filing and review prior filings;	
	C.M. SHUMADINE	0.40 hr.
10/12/18	Email to Ms. Myers re: telephone callobtaining information from the OES	
	C.M. SHUMADINE	0.10 hr.
10/12/18	Email to Ms. Goldman and Mr. Harr draft motions and briefs regarding su	
	C.M. SHUMADINE	0.10 hr.
10/12/18	Follow-up email from and to Mr. Ha Ms. Goldman re: statement of undisp	
	C.M. SHUMADINE	0.20 hr.
10/12/18	Email from Mr. Prince and review of proposed by Mr. Prince;	f discovery
	C.M. SHUMADINE	0.40 hr.
10/12/18	Email from and to Mr. Harrison re: local experts and consider local expe	
	C.M. SHUMADINE	0.20 hr.
10/12/18	Email from and to Ms. Myers and M re: telephone call with Ms. Myers re:	
	C.M. SHUMADINE	0.10 hr.
10/15/18	Email to Mr. Hibsher responding to	his email;
	C.M. SHUMADINE	0.10 hr.
10/15/18	Email from Ms. Goldman to Mr. Pri	nce re: discovery;
	C.M. SHUMADINE	0.10 hr.

10/15/18	Follow-up telephone call from Mr. Corbin re: his questions after reading the Complaint;	
	C.M. SHUMADINE	0.20 hr.
10/16/18	Email from and to Mr. Harrison re: o	eall with Ms. Myers;
	C.M. SHUMADINE	0.10 hr.
10/16/18	Email to and from Ms. Myers;	
	C.M. SHUMADINE	0.10 hr.
10/16/18	Email from Ms. Goldman re: protect review of protective order;	ive order and
	C.M. SHUMADINE	0.10 hr.
10/16/18	Email to Ms. Goldman re: issues regorder;	arding the protective
	C.M. SHUMADINE	0.10 hr.
10/16/18	Conference call with Ms. Goldman and Mr. Harrison re: protective order and other issues in case;	
	C.M. SHUMADINE	0.80 hr.
10/16/18	Revise draft protective order and email revisions to Ms. Goldman;	
	C.M. SHUMADINE	0.50 hr.
10/16/18	Prepare for and participate in call with Ms. Myers, OES personnel, and Mr. Harrison;	
	C.M. SHUMADINE	0.70 hr.
10/16/18	Follow-up telephone call to Mr. Harrison re: call with OES personnel and Ms. Myers;	
	C.M. SHUMADINE	0.20 hr.
10/17/18	Voicemail and telephone conference DeBene at Federal Court Clerk's Off	

	C.M. SHUMADINE	0.20 hr.
10/17/18	Email to Mr. Hibsher, et al., re: call and the provision of instant access by November 1;	
	C.M. SHUMADINE	0.10 hr.
10/17/18	Email from Mr. Harrison re: OES de	eclaration;
	C.M. SHUMADINE	0.10 hr.
10/17/18	Analyze issues regarding the OES de and email to Mr. Harrison;	eclaration
	C.M. SHUMADINE	0.20 hr.
10/17/18	Email from and to Ms. Goldman re: falling on weekends or holidays under	
	C.M. SHUMADINE	0.10 hr.
10/17/18	Review summary of discussion with to Ms. Goldman re: issues raised by	
	C.M. SHUMADINE	0.20 hr.
10/17/18	Review email from Ms. Goldman to discussion;	Mr. Prince re: her
	C.M. SHUMADINE	0.10 hr.
10/18/18	Email from and to Ms. Goldman re:	depositions;
	C.M. SHUMADINE	0.40 hr.
10/18/18	Telephone call to Ms. Myers' office;	
	C.M. SHUMADINE	1.00 hr.
10/18/18	Email from Mr. Prince and review su disclosure;	applemental initial
	C.M. SHUMADINE	0.10 hr.
10/18/18	Email from Mr. Prince re: protective	order;

0.10 hr. C.M. SHUMADINE 10/19/18 Email from Ms. Goldman to Mr. Prince re: protective order and discovery; 0.10 hr. C.M. SHUMADINE 10/19/18 Email from Mr. Prince with revised Protective Order and review of revised Protective Order; 0.10 hr. C.M. SHUMADINE 10/19/18 Telephone conference with Ms. Myers re: the OES's position and re: its willingness to assist; C.M. SHUMADINE 0.20 hr. 10/19/18 Telephone conference with Mr. Harrison re: Ms. Myers' call and her request that any declaration be drafted by us; C.M. SHUMADINE 0.20 hr. 10/19/18 Email from Mr. Hibsher re: protective order; C.M. SHUMADINE 0.10 hr. 10/19/18 Review email from Mr. Harrison to Mr. Hibsher and response; C.M. SHUMADINE 0 10 hr 10/19/18 Telephone conference with Mr. Hibsher re: protective order; C.M. SHUMADINE 0.10 hr. 10/19/18 Email from Mr. Prince with revised protective order and review revised protective order; 0 10 hr C.M. SHUMADINE 10/19/18 Email from Mr. Hibsher approving form of protective order and email to Mr. Prince providing permission for him to file the approved protective order; C.M. SHUMADINE 0.10 hr.

10/20/18	Review email from Mr. Prince and responses of clerks to discovery;	
	C.M. SHUMADINE	0.40 hr.
10/20/18	Review email from Mr. Girdner and Mr. Hibsher;	response to
	C.M. SHUMADINE	0.10 hr.
10/22/18	Email from Ms. Goldman with outlindiscovery deficiencies;	ne of clerk's
	C.M. SHUMADINE	0.20 hr.
10/22/18	Email to Ms. Goldman with reaction regarding the discovery responses;	s and thoughts
	C.M. SHUMADINE	0.10 hr.
10/23/18	Review email from Mr. Prince with motion for entry of protective order, review attachment and send email to Mr. Prince approving filing of the motion;	
	C.M. SHUMADINE	0.20 hr.
10/23/18	Email from Ms. Goldman re: discov	ery issues;
	C.M. SHUMADINE	0.10 hr.
10/23/18	Email from Ms. Cochran with supplemental production of documents from the clerks;	
	C.M. SHUMADINE	0.20 hr.
10/24/18	Email from Ms. Goldman with draft Mr. Prince re: discovery responses;	letter to
	C.M. SHUMADINE	0.20 hr.
10/24/18	Email to Ms. Goldman re: letter and of depositions;	cancelling
	C.M. SHUMADINE	0.10 hr.
10/24/18	Email from Ms. Aronholt with depo	sition notices;

	C.M. SHUMADINE	0.10 hr.
10/24/18	Review notice of new procedures in District of Virginia clerk's office and Mr. Hibsher, et al.;	
	C.M. SHUMADINE	0.20 hr.
10/25/18	Review email to Ms. Goldman, Mr. letter outlining discovery issues;	Prince, and
	C.M. SHUMADINE	0.20 hr.
10/25/18	Review email from Ms. Goldman recompel and re: briefing schedule and	
	C.M. SHUMADINE	0.20 hr.
10/25/18	Prepare email responding to Ms. Go advice;	ldman's request for
	C.M. SHUMADINE	0.10 hr.
10/25/18	Email from Mr. Prince re: discovery	issues;
	C.M. SHUMADINE	0.10 hr.
10/25/18	Email to Ms. Goldman with draft of and brief in support in prior action;	motion to compel
	C.M. SHUMADINE	0.10 hr.
10/29/18	Email from Ms. Goldman with prop	osed objections;
	C.M. SHUMADINE	0.10 hr.
10/29/18	Review objections and email to Ms.	Goldman;
	C.M. SHUMADINE	0.30 hr.
10/29/18	Email from Ms. Goldman re: final v	ersion of objections;
	C.M. SHUMADINE	0.10 hr.
10/30/18	Email from Mr. Prince with letter reand review of letter;	discovery

C.M. SHUMADINE 0.20 hr.

10/30/18 Voicemail and telephone conference with Mr. Hibsher

re: deadlines in light of lack of scheduling order;

C.M. SHUMADINE 0.10 hr.

10/30/18 Conference call with Mr. Hibsher, Mr. Harrison and

Ms. Goldman re: deadlines, experts and local rules;

C.M. SHUMADINE 0.30 hr.

10/30/18 Email from Mr. Prince removing confidentiality

designation for a specific document;

C.M. SHUMADINE 0.10 hr.

10/31/18 Review entry of agreed protective order and email

from Mr. Hibsher to Mr. Prince re: depositions;

C.M. SHUMADINE 0.10 hr.

10/31/18 Review clerks' discovery responses re: expert

witness testimony;

C.M. SHUMADINE 0.30 hr.

#### October 2018 Summary of Fees

C.M. SHUMADINE: 22.40 hrs. @ \$450/hr. \$ 10,080.00

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11/01/18 Email from Ms. Goldman re: expert testimony with

attachments and review of attachments;

C.M. SHUMADINE 0.30 hr.

11/01/18 Email from Ms. Goldman and Mr. Prince re:

rescheduling depositions set for November;

C.M. SHUMADINE 0.10 hr.

11/02/18 Email to Ms. Goldman with draft 30(b)(6) notice

and review of notice:

C.M. SHUMADINE 0.30 hr.

11/02/18	Respond to Ms. Goldman re: issues re: 30(b)(6) notice and depositions;	
	C.M. SHUMADINE	0.20 hr.
11/02/18	Email to Ms. Goldman re: expert testimony;	
	C.M. SHUMADINE	0.10 hr.
11/05/18	Review declarations of Mr. Schaefer and Ms. Smith re: OES position and manuals;	
	C.M. SHUMADINE	0.40 hr.
11/06/18	Email from Mr. Prince to Ms. Goldman re: narrowing scope of request and response from Ms. Goldman;	
	C.M. SHUMADINE	0.10 hr.
11/06/18	Email from Ms. Goldman re: scheduling depositions;	
	C.M. SHUMADINE	0.10 hr.
11/06/18	Email from Mr. Prince and response from Mr. Hibsher re: extension of time to respond to discovery;	
	C.M. SHUMADINE	0.10 hr.
11/06/18	Conference call with Mr. Hibsher and Ms. Goldman re: OES and discovery issues;	
	C.M. SHUMADINE	0.20 hr.
11/06/18	Email from and to Ms. Goldman re: 30(b)(6) proposed notice;	
	C.M. SHUMADINE	0.10 hr.
11/06/18	Arrange for court reporter for depositions on November 28 and 29;	
	C.M. SHUMADINE	0.10 hr.
11/06/18	Email from Mr. Prince re: lack of agreement to document requests;	
	C.M. SHUMADINE	0.10 hr.

11/06/18	Email from Ms. Goldman re: search of documents in our files that might be responsive to discovery;		
	C.M. SHUMADINE	0.10 hr.	
11/06/18	Office conference with Ms. Yoder re: search of emails and other documents to respond to discovery;		
	C.M. SHUMADINE	0.20 hr.	
11/06/18	Email from Ms. Goldman to Mr. Prince with notices and email from Ms. Goldman to Ms. McCloud with notices for depositions;		
	C.M. SHUMADINE	0.10 hr.	
11/06/18	Coordinate with Mr. Shumadine on searching Outlook emails responsive to the document production and coordinate with Ms. Martinez on exporting the same as pst files;		
	P. YODER	0.50 hr.	
11/07/18	Preliminary review of documents located by Ms. Yode		
	C.M. SHUMADINE	0.10 hr.	
11/07/18	Email from Mr. Hibsher re: Rule 16(b) conference and email from Ms. Baxter re: dates for conference;		
	C.M. SHUMADINE	0.70 hr.	
11/07/18	Email from Mr. Prince and Mr. Harr conference;	nail from Mr. Prince and Mr. Harrison re: Rule 16(b) inference;	
	C.M. SHUMADINE	0.40 hr.	
11/07/18	Email to and from Ms. Goldman re: document search conducted by Ms. Yoder;		
	C.M. SHUMADINE	0.10 hr.	
11/07/18	Telephone conference with Mr. Harrison re: issues re: Rule 16(b) conference;		

C.M. SHUMADINE 0.10 hr. 11/07/18 Email to Ms. Baxter re: Rule 16(b) conference; C.M. SHUMADINE 0.40 hr. 11/07/18 Follow-up emails re: scheduling; C.M. SHUMADINE 0.10 hr. 11/07/18 Email from Mr. Prince with 30(b)(6) topics and review and analyze topics selected; C.M. SHUMADINE 0.20 hr. 11/07/18 Office conference with Ms. Yoder re: document review of emails relating to the case with third parties; C.M. SHUMADINE 0.10 hr. 11/07/18 Review Mr. Shumadine's Outlook email folder to locate, gather and copy all responsive emails to the document production request of Ms. Goldman; P. YODER 1.20 hr. 11/08/18 Voicemail from Mr. Prince and email from Mr. Harrison re: Rule 16(b) conference; C M SHUMADINE 0 10 hr 11/08/18 Email to Ms. Baxter confirming date and time for Rule 16(b) conference; 0.10 hr. C.M. SHUMADINE 11/08/18 Telephone conference with Mr. Corbin re: expert testimony and his decision not to be an expert witness; C.M. SHUMADINE 0.20 hr. 11/08/18 Email to and from Mr. Hibsher, et al., re: Mr. Corbin's decision and locating an additional expert; C.M. SHUMADINE 0.10 hr.

11/08/18	Analyze possible additional experts and email to Mr. Hibsher;	
	C.M. SHUMADINE	0.30 hr.
11/08/18	Review docket entries and email to and from Mr. Harrison re: errors in scheduling;	
	C.M. SHUMADINE	0.10 hr.
11/08/18	Email from Ms. Goldman re: Rule 16(b) conference and voicemail to Ms. Baxter re: Rule 16(b) conference;	
	C.M. SHUMADINE	0.10 hr.
11/09/18	Review docket entry and email from Ms. Baxter and email to Ms. Goldman re: Rule 16(b) conference;	
	C.M. SHUMADINE	0.10 hr.
11/09/18	Email from Ms. Corcoran with additional documents and preliminary review of documents;	
	C.M. SHUMADINE	0.20 hr.
11/09/18	Office conference with Mr. Giordano re: Bob Salter's possible service as an expert witness;	
	C.M. SHUMADINE	0.20 hr.
11/09/18	Telephone conference with Mr. Salter re: his possible expert testimony;	
	C.M. SHUMADINE	0.30 hr.
11/09/18	Email to Mr. Salter re: conversation;	
	C.M. SHUMADINE	0.10 hr.
11/09/18	Follow-up telephone call from Mr. Salter with questions regarding his expert testimony;	
	C.M. SHUMADINE	0.10 hr.
11/09/18	Email to and from Mr. Hibsher re: M possible service;	Ir. Salter's

	C.M. SHUMADINE	0.10 hr.
11/09/18	Additional email from and to Mr. Hi for conference call with Mr. Salter a	_
	C.M. SHUMADINE	0.50 hr.
11/09/18	Additional review of documents loca and email to Ms. Goldman re: transmodocuments in the form requested;	-
	C.M. SHUMADINE	0.20 hr.
11/09/18	Assist Mr. Shumadine with gathering pst format to forward to Ms. Goldma	
	P. YODER	0.30 hr.
11/12/18	Gather responsive emails and corres organize within an electronic folder and forward same to Ms. Goldman f	in pst format
	P. YODER	0.80 hr.
11/13/18	Email from and to Ms. Goldman re: to 30(b)(6) topics;	objection
	C.M. SHUMADINE	0.50 hr.
11/13/18	Review email from Ms. Goldman re relating to paper filed complaint and Mr. Prince;	
	C.M. SHUMADINE	0.10 hr.
11/14/18	Email from Ms. Goldman re: 7th Cin and re: local practice re: advising the authority;	
	C.M. SHUMADINE	0.10 hr.
11/14/18	Response to Ms. Goldman re: provio to the Court;	ling new authority
	C.M. SHUMADINE	0.10 hr.

11/14/18	Email from Mr. Prince re: 30(b)(6) designations;	
	C.M. SHUMADINE	0.10 hr.
11/14/18	Follow-up email from Ms. Goldman ED Va. Clerk's Office;	and reply re:
	C.M. SHUMADINE	0.10 hr.
11/14/18	Email from Ms. Cochran with additional production;	onal document
	C.M. SHUMADINE	0.20 hr.
11/14/18	Review follow-up production of add by Mr. Prince;	itional documents
	C.M. SHUMADINE	0.20 hr.
11/15/18	Email from Ms. Goldman re: access in the Eastern District of Virginia;	
	C.M. SHUMADINE	0.10 hr.
11/15/18	Research issues of access raised by Ms. Goldman and email to all litigators;	
	C.M. SHUMADINE	0.30 hr.
11/15/18	Email from and to Ms. Goldman re: deposition logistics;	
	C.M. SHUMADINE	0.20 hr.
11/15/18	Email from Mr. Harrison re: subpoenas;	
	C.M. SHUMADINE	0.10 hr.
11/16/18	Telephone conference with Ms. Myers re: OES deposition;	
	C.M. SHUMADINE	0.20 hr.
11/16/18	Email to Mr. Harrison re: telephone call with Ms. Myers re: OES deposition;	
	C.M. SHUMADINE	0.10 hr.
11/16/18	Review subpoena and forms re: OES	30(b)(6) deposition

	and document request;	
	C.M. SHUMADINE	0.30 hr.
11/16/18	Email to Mr. Harrison re: forms and document requests;	30(b)(6) notice and
	C.M. SHUMADINE	0.10 hr.
11/16/18	Follow-up emails re: service on OE	S;
	C.M. SHUMADINE	0.30 hr.
11/16/18	Review code re: service on OES to accept service;	determine who can
	C.M. SHUMADINE	0.20 hr.
11/16/18	Review email from Ms. Goldman to discovery and the attachments to Ms	
	C.M. SHUMADINE	0.10 hr.
11/16/18	Receipt and review of a subpoena duces tecum from Mr. Harrison and coordinate with Mr. Shumadine and Ms. McCloud on revisions needed to same;	
	P. YODER	0.50 hr.
11/18/18	Email responding to Mr. Harrison reand 30(b)(6) deposition to OES;	e: subpoena to OES
	C.M. SHUMADINE	0.10 hr.
11/18/18	Email from and to Ms. Goldman re: with Mr. Larson;	telephone calls
	C.M. SHUMADINE	0.30 hr.
11/18/18	Follow-up email from and to Mr. Had 30(b)(6) deposition and document re	
	C.M. SHUMADINE	0.10 hr.

Email from Mr. Harrison re: call to Ms. Myers;

11/19/18

	C.M. SHUMADINE	0.10 hr.
11/19/18	Email from Ms. Goldman and review of draft discovery responses on behalf of Courthouse News;	
	C.M. SHUMADINE	0.50 hr.
11/19/18	Email from and to Mr. Hibsher re: Reconference and use of experts and for	
	C.M. SHUMADINE	0.20 hr.
11/19/18	Telephone conference with Ms. Mye issues;	ers re: scheduling
	C.M. SHUMADINE	0.30 hr.
11/19/18	Email from and to Ms. Goldman re:	scheduling;
	C.M. SHUMADINE	0.10 hr.
11/19/18	Email from Mr. Prince and Mr. Hibs scheduling and response;	sher re:
	C.M. SHUMADINE	0.10 hr.
11/19/18	Review Rule 26 and Rule 16 re: cor	nference call;
	C.M. SHUMADINE	0.20 hr.
11/20/18	Prepare for conference call re: Rule 16 issues;	
	C.M. SHUMADINE	0.20 hr.
11/20/18	Conference call with Mr. Hibsher, Mr. Harrison and Ms. Goldman re: Rule 16(b) conference and OES subpoena and expert testimony;	
	C.M. SHUMADINE	0.40 hr.
11/20/18	Email from Mr. Hibsher re: E.D. Va	a. procedures;
	C.M. SHUMADINE	0.10 hr.
11/20/18	Review and analyze issues re: the O depositions;	ES and OES

	C.M. SHUMADINE	0.20 hr.
11/21/18	Email from Ms. Myers re: OES deposition and review schedule;	
	C.M. SHUMADINE	0.10 hr.
11/21/18	Email to and from Mr. Hibsher re: se	chedule;
	C.M. SHUMADINE	0.10 hr.
11/21/18	Review email to Mr. Harrison and M	Is. Myers;
	C.M. SHUMADINE	0.10 hr.
11/26/18	Email to Mr. Hibsher, et al., re: Rule and response from Mr. Harrison;	e 16(b) conference
	C.M. SHUMADINE	0.10 hr.
11/26/18	Follow-up email from Ms. Goldman and Mr. Harrison re: conference and other issues relating to prosecution of the case;	
	C.M. SHUMADINE	0.40 hr.
11/26/18	Email from Mr. Prince with additional documents and brief review of documents;	
	C.M. SHUMADINE	0.10 hr.
11/26/18	Email from Mr. Prince re: deposition	ns and schedules;
	C.M. SHUMADINE	0.10 hr.
11/26/18	Brief additional review of document the clerks;	s produced by
	C.M. SHUMADINE	0.20 hr.
11/26/18	Review email from Ms. Goldman re	: depositions;
	C.M. SHUMADINE	0.10 hr.
11/26/18	Review response from Mr. Prince re	: depositions;
	C.M. SHUMADINE	0.10 hr.

11/26/18	Email from Mr. Prince with supplemental answers and review of supplemental answers;	
	C.M. SHUMADINE	0.20 hr.
11/26/18	Email from Mr. Harrison re: Hennes	sey's deposition;
	C.M. SHUMADINE	0.10 hr.
11/27/18	Email from and to Mr. Harrison re: l	ogistics for deposition;
	C.M. SHUMADINE	0.20 hr.
11/27/18	Email from Ms. Goldman re: Rule 1	6(b) conference;
	C.M. SHUMADINE	0.10 hr.
11/27/18	Meeting with Ms. Goldman and attend Rule 16(b) conference at federal court and discuss Rule 16(b) conference with Ms. Goldman;	
	C.M. SHUMADINE	1.20 hr.
11/27/18	Meeting with Mr. Hibsher and Ms. Goldman to discuss case and logistics and how to proceed;	
	C.M. SHUMADINE	0.80 hr.
11/27/18	Telephone conference with Mr. Harrison re: OES subpoena and possibility of expediting documents;	
	C.M. SHUMADINE	0.20 hr.
11/27/18	Email from Mr. Harrison to Ms. Myers re: OES document and response from Ms. Myers;	
	C.M. SHUMADINE	0.10 hr.
11/28/18	Review emails re: CNS document production;	
	C.M. SHUMADINE	0.10 hr.
11/28/18	Office conference with Mr. Hibsher and Ms. Goldman and participate in conference call with Ms. Matteo-Boehm re: depositions;	

	C.M. SHUMADINE	0.30 hr.
11/29/18	Review additional documents produced by CNS;	
	C.M. SHUMADINE	0.20 hr.
11/29/18	Meeting with Mr. Harrison and Ms. Goldman and discussion of progress of deposition;	
	C.M. SHUMADINE	0.20 hr.
11/30/18	Email from and to Mr. Harrison re	deposition schedule:

Email from and to Mr. Harrison re: deposition schedule;

C.M. SHUMADINE

0.10 hr.

\$ 9,106.50

### **November 2018 Summary of Fees**

	<u>Hours</u>	Rate/Hr	<u>Amount</u>
C.M. SHUMADINE	19.10	450.00	8,595.00
P. YODER	3.30	155.00	511.50
	22.40		9,106.50

## **November 2018 Fees for Professional Services**

\* \* \* \* \* \* \*

12/10/18	Email from Ms. Goldman re: depositions;	
	C.M. SHUMADINE	0.10 hr.
12/10/18	Email to Mr. Harrison re: OES depo	sition logistics;
	C.M. SHUMADINE	0.10 hr.
12/10/18	Arrange for court reporter and conference rooms for additional depositions;	
	C.M. SHUMADINE	0.10 hr.
12/11/18	Review email from Mr. Harrison to l OES deposition;	Ms. Myers re:
	C.M. SHUMADINE	0.10 hr.
12/11/18	Review email from Ms. Goldman reand depositions generally;	OES depositions

0.10 hr. C.M. SHUMADINE Emails re: logistics of handling the scheduled depositions; 12/11/18 C.M. SHUMADINE 0.10 hr. Email from Ms. Myers and preliminary review of 12/14/18 OES documents: C.M. SHUMADINE 0.20 hr. 12/17/18 Email from Ms. Goldman and Mr. Harrison re: OES deposition; C.M. SHUMADINE 0.10 hr. 12/20/18 Telephone conference with Mr. Hibsher re: OES deposition; C.M. SHUMADINE 0.30 hr. 12/20/18 Email from Ms. Goldman and brief review of transcripts; C.M. SHUMADINE 0.20 hr. 12/21/18 Email from Ms. Aronhalt with letter from Mr. Prince and notices of depositions; C.M. SHUMADINE 0.10 hr. **December 2018 Summary of Fees C.M. SHUMADINE:** 1.50 hrs. @ \$450/hr. \$ 675.00 01/03/19 Email from Ms. Goldman to Mr. Prince re: Manassas deposition and review file; C.M. SHUMADINE 0.10 hr. Email from Mr. Prince re: deposition and response 01/04/19 from Ms. Goldman;

Review email from Ms. Goldman and second request

0 10 hr

01/04/19

C.M. SHUMADINE

	for production of documents to George Schaefer;	
	C.M. SHUMADINE	0.10 hr.
01/10/19	Telephone conference with Mr. Hibs testimony and possible motion re: testimony	
	C.M. SHUMADINE	0.30 hr.
01/10/19	Analyze issues raised in call with Mr. Hibsher to determine the best way to proceed before the Court;	
	C.M. SHUMADINE	0.20 hr.
01/14/19	Email from Ms. Goldman to Mr. Prinadditional depositions and analyze ad	
	C.M. SHUMADINE	0.10 hr.
01/14/19	Email re: party witnesses and review law and order and local rules and follow-up email from Ms. Goldman re: issue;	
	C.M. SHUMADINE	0.20 hr.
01/15/19	Email from Ms. Goldman re: motion to supplement record and briefing in response;	
	C.M. SHUMADINE	0.10 hr.
01/15/19	Follow-up emails re: Friday filing;	
	C.M. SHUMADINE	0.20 hr.
01/17/19	Email from Mr. Harrison and review contention interrogatories;	question re:
	C.M. SHUMADINE	0.10 hr.
01/17/19	Email responding to Mr. Harrison reinterrogatories and expert disclosure	
	C.M. SHUMADINE	0.10 hr.
01/17/19	Email from Ms. Goldman and review to supplement and brief in support;	v draft motion

	C.M. SHUMADINE	0.20 hr.
01/17/19	Email to Ms. Goldman re: comments;	
	C.M. SHUMADINE	0.20 hr.
01/18/19	Email from Mr. Harrison with additional questions re: contention interrogatories and reply;	
	C.M. SHUMADINE	0.10 hr.
01/18/19	Review and file motion to suppleme	nt and brief in support;
	C.M. SHUMADINE	0.30 hr.
01/18/19	Email re: transcript errors and how to	o respond;
	C.M. SHUMADINE	0.20 hr.
01/22/19	Review email from Ms. Aronholt with letter from Mr. Prince and objection filed by Mr. Schaefer;	
	C.M. SHUMADINE	0.20 hr.
01/22/19	Email from and to Ms. Goldman re: standing order and effect on case;	
	C.M. SHUMADINE	0.20 hr.
01/23/19	Email from Ms. Goldman to Mr. Pri	nce re: objections;
	C.M. SHUMADINE	0.10 hr.
01/24/19	Email from Mr. Hibsher with proposed expert stipulation and review expert stipulation;	
	C.M. SHUMADINE	0.20 hr.
01/25/19	Email from Mr. Prince and Mr. Hibs objections and brief review of object	
	C.M. SHUMADINE	0.10 hr.
01/28/19	Email from Ms. Baxter re: hearing or and motion to supplement record;	n motion to dismiss

0.10 hr. C.M. SHUMADINE 01/28/19 Email from and to Mr. Hibsher and email from Mr. Prince re: dates; C.M. SHUMADINE 0.10 hr. 01/28/19 Emails re: filing and revision and filing of brief in opposition to motion to transfer; C.M. SHUMADINE 0.70 hr. 01/29/19 Email from Mr. Hibsher to Ms. Baxter and telephone call from Ms. Baxter: C.M. SHUMADINE 0.20 hr. 01/29/19 Telephone conference with Mr. Hibsher re: issues in motions to dismiss; C.M. SHUMADINE 0.20 hr. 01/29/19 Email from and to Mr. Harrison re: deposition logistics; C.M. SHUMADINE 0.20 hr. 01/29/19 Review expert disclosure forms and send to Ms. Goldman; C.M. SHUMADINE 0.10 hr. 01/30/19 Email from Mr. Hibsher re: discovery; C.M. SHUMADINE 0.10 hr. **January 2019 Summary of Fees C.M. SHUMADINE:** 5.10 hrs. @ \$450/hr. \$ 2,295.00 02/01/19 Review motion to dismiss and memorandum in support filed by clerks; 0.30 hr. C.M. SHUMADINE 02/01/19 Email from Ms. Goldman re: abstention and motion to dismiss

and response;

C.M. SHUMADINE

0.10 hr.

02/04/19 Meeting with Mr. Hibsher, Mr. Harrison and Ms. Goldman

re: depositions and requesting oral argument;

C.M. SHUMADINE

0 30 hr

02/04/19 Email from Ms. Goldman re: clerks obtaining opinion

from Virginia Attorney General;

C.M. SHUMADINE

0.20 hr.

02/04/19 Office conference with Ms. Goldman re: abstention

issues and Virginia procedure;

C.M. SHUMADINE

0.20 hr.

02/05/19 Email from Ms. Goldman and response re: motion

for extension;

C.M. SHUMADINE

0.20 hr.

02/05/19 Office conference with Ms. Goldman re: motion for

extension and for hearing;

C.M. SHUMADINE

0.20 hr.

02/05/19 Additional office conference with Ms. Goldman,

et al., re: filing and with Mr. Hibsher re: a discussion of

issues regarding argument before Judge Morgan;

C.M. SHUMADINE

0.20 hr.

02/06/19 Meeting with Mr. Hibsher and Ms. Goldman re: depositions

and discussing with Mr. Hibsher his reaction to being in Judge Morgan's court and providing suggestions for oral

argument before Judge Morgan;

C.M. SHUMADINE

0.20 hr.

02/06/19 Meeting with Mr. Hibsher and Ms. Goldman re: filing

agreed motions;

C.M. SHUMADINE

0.20 hr.

02/06/19	Meeting with Mr. Prince re: filing agreed motions and email from Mr. Prince authorizing filing;	
	C.M. SHUMADINE	0.20 hr.
02/06/19	Email from Mr. Harrison and review motion to supplement;	Reply re:
	C.M. SHUMADINE	0.20 hr.
02/07/19	File consent motion for extension an argument and review both;	d request for oral
	C.M. SHUMADINE	0.20 hr.
02/07/19	Email from and to Ms. Goldman re:	Reply;
	C.M. SHUMADINE	0.20 hr.
02/07/19	Review and file Reply;	
	C.M. SHUMADINE	0.20 hr.
02/08/19	Email from Ms. Goldman re: transcript and attempt to follow up with Zahn to obtain transcript expeditiously;	
	C.M. SHUMADINE	0.10 hr.
02/11/19	Email from Mr. Prince re: documents and response from Ms. Goldman;	
	C.M. SHUMADINE	0.10 hr.
02/12/19	Email from Mr. Harrison with draft declaration for Mr. Hibsher and respond and comment on draft declaration:	
	C.M. SHUMADINE	0.30 hr.
02/13/19	Email from Mr. Hibsher re: expert disclosures, Attorney General opinion, and timing of motion for summary judgment and analyze issues and respond to Mr. Hibsher;	
	C.M. SHUMADINE	0.40 hr.
02/14/19	Telephone conference with Mr. Hibs	sher re: order,

	contact with Attorney General and discovery issues;	
	C.M. SHUMADINE	0.20 hr.
02/18/19	Email from Ms. Goldman with exper	rt witness disclosure;
	C.M. SHUMADINE	0.10 hr.
02/18/19	Review disclosure and email comme	ents to Ms. Goldman;
	C.M. SHUMADINE	0.20 hr.
02/18/19	Additional email from Ms. Goldman	re: response;
	C.M. SHUMADINE	0.10 hr.
02/18/19	Review draft brief opposing abstention declaration of Mr. Hibsher;	on and
	C.M. SHUMADINE	0.40 hr.
02/19/19	Continue review of draft response re	: abstention;
	C.M. SHUMADINE	0.30 hr.
02/19/19	Email from Mr. Prince and Mr. Hibsher re: agreed order;	
	C.M. SHUMADINE	0.10 hr.
02/19/19	Follow-up email from Mr. Hibsher reand re: local procedure;	e: agreed order
	C.M. SHUMADINE	0.10 hr.
02/20/19	Review email from Mr. Hibsher to M	Ar. Prince re: service;
	C.M. SHUMADINE	0.10 hr.
02/21/19	Email from and to Ms. Goldman re:	Mr. Hibsher's declaration;
	C.M. SHUMADINE	0.10 hr.
02/21/19	Email from Ms. Goldman and review to motion for abstention;	v and file opposition
	C.M. SHUMADINE	0.40 hr.

02/21/19	Follow-up email re: filing of opposit	ion;	
	C.M. SHUMADINE	0.10 hr.	
02/22/19	Email from Mr. Prince with motion t Rule 16b scheduling order and agree	2	
	C.M. SHUMADINE	0.20 hr.	
02/22/19	Email from Mr. Prince re: filing;		
	C.M. SHUMADINE	0.10 hr.	
02/22/19	Email from Mr. Hibsher authorizing and to Mr. Prince authorizing the fili		
	C.M. SHUMADINE	0.10 hr.	
02/25/19	Email from Ms. Baxter and email to et al., re: hearing;	Mr. Hibsher,	
	C.M. SHUMADINE	0.10 hr.	
02/25/19	Review notice of hearing on PACER	.,	
	C.M. SHUMADINE	0.10 hr.	
02/27/19	Review Ms. Smith's objections and r	responses;	
	C.M. SHUMADINE	0.20 hr.	
02/28/19	Telephone conference with Mr. Hibs filed by defendants and re: issues for and analyze issues raised by Mr. Hib	oral argument	
	C.M. SHUMADINE	0.70 hr.	
February 2019 Summary of Fees			
C.M. SHUM	ADINE: 7.70 hrs. @ \$4	450/hr.	\$ 3,465.00
	* * * *	* * *	
03/02/19	Email from Ms. Goldman re: 30(b)(6 reply email from Mr. Prince;	6) motions and	

	C.M. SHUMADINE	0.10 hr.
03/02/19	Review reply on abstention filed by clerks;	
	C.M. SHUMADINE	0.10 hr.
03/03/19	Continue review of response re: abst	ention;
	C.M. SHUMADINE	0.40 hr.
03/03/19	Analyze response re: abstention and et al., with thoughts re: argument of	
	C.M. SHUMADINE	0.40 hr.
03/05/19	Email from Mr. Hibsher re: 30(b)(6) privilege log;	deposition and
	C.M. SHUMADINE	0.10 hr.
03/05/19	Email from and to Mr. Harrison re: local practice re: summary judgment briefing;	
	C.M. SHUMADINE	0.20 hr.
03/06/19	Email from Mr. Hibsher to Mr. Prince deposition and response from Mr. Pr	
	C.M. SHUMADINE	0.10 hr.
03/07/19	Email from Mr. Hibsher to Mr. Princ conference;	ee re: Rule 23(c)
	C.M. SHUMADINE	0.10 hr.
03/07/19	Email from Mr. Prince responding at file re: 23(c) conference;	nd review
	C.M. SHUMADINE	0.10 hr.
03/08/19	Emails from Ms. Goldman with disc	overy to defendants;
	C.M. SHUMADINE	0.20 hr.
03/08/19	Email from Ms. Aronhalt re: deposit	ions;

	C.M. SHUMADINE	0.10 hr.
03/08/19	Email from Mr. Prince and Mr. Hibsher re: scheduling;	
	C.M. SHUMADINE	0.10 hr.
03/13/19	Appearance before Judge Morgan re motion to dismiss and post-hearing of	
	C.M. SHUMADINE	3.10 hr.
03/13/19	Review file and analyze issues re: Jure: Mr. Girdner's questions;	ndge Morgan's ruling
	C.M. SHUMADINE	0.40 hr.
03/14/19	Review ruling on PACER;	
	C.M. SHUMADINE	0.10 hr.
03/14/19	Review email from Ms. Aronhalt and Mr. Schaefer's second set of interrogatories to CNS;	
	C.M. SHUMADINE	0.10 hr.
03/15/19	Voicemail and telephone conference with Mr. Girdner re: issues in case and reactions to court's comments and rulings;	
	C.M. SHUMADINE	0.40 hr.
03/15/19	Review file re: questions discussed with Mr. Girdner to be prepared for follow-up conversation;	
	C.M. SHUMADINE	0.20 hr.
03/16/19	Email from Mr. Girdner and review email;	of file re: Mr. Girdner's
	C.M. SHUMADINE	0.10 hr.
03/17/19	Email from Mr. Girdner with his notes and email from and to Mr. Hibsher re: telephone call;	
	C.M. SHUMADINE	0.30 hr.
03/17/19	Review and analyze transcript of arg	gument provided by

	Mr. Girdner;	
	C.M. SHUMADINE	0.30 hr.
03/17/19	Follow-up email from and to Mr. Hi and Mr. Girdner's comments;	ibsher re: transcript
	C.M. SHUMADINE	0.10 hr.
03/18/19	Review transcript of hearing before and prepare for telephone call with I	
	C.M. SHUMADINE	0.50 hr.
03/18/19	Telephone conference with Mr. Hib before Judge Morgan and issues rais	
	C.M. SHUMADINE	0.40 hr.
03/18/19	Conference call with Mr. Girdner, Mr. e: the hearing and future actions in	
	C.M. SHUMADINE	0.80 hr.
03/19/19	Telephone conference with Ms. Goldman re: expert report and email transmitting expert report;	
	C.M. SHUMADINE	0.10 hr.
03/19/19	Review email from Ms. Goldman re and review report and respond to Maquestions re: report;	
	C.M. SHUMADINE	0.20 hr.
03/19/19	Review opinion and order entered b	y Judge Morgan;
	C.M. SHUMADINE	0.20 hr.
03/19/19	Email from Mr. Girdner and email f Matteo-Boehm re: Judge Morgan's o	
	C.M. SHUMADINE	0.40 hr.
03/23/19	Email from and to Mr. Hibsher re: p expert discovery extension;	proposal for

	C.M. SHUMADINE	0.10 hr.
03/24/19	Email from and to Ms. Goldman re: judgment order and issues regarding	-
	C.M. SHUMADINE	0.20 hr.
03/25/19	Email from and to Ms. Goldman re: for summary judgment briefing;	filing for schedule
	C.M. SHUMADINE	0.10 hr.
03/25/19	Follow-up email from and to Ms. Go Ms. Goldman to Mr. Prince and review	
	C.M. SHUMADINE	0.20 hr.
03/27/19	Review email from Ms. Goldman to filing consent motion;	Mr. Prince re:
	C.M. SHUMADINE	0.10 hr.
03/27/19	Email from Mr. Prince approving an Ms. Goldman and follow-up emails;	email from
	C.M. SHUMADINE	0.10 hr.
03/27/19	Review documents re: filing;	
	C.M. SHUMADINE	0.10 hr.
03/27/19	Telephone conference with Mr. Gird in Clerk's Office;	ner re: procedure
	C.M. SHUMADINE	0.30 hr.
03/27/19	Office conferences with Mr. Hibsher re: progress of the deposition;	and Ms. Goldman
	C.M. SHUMADINE	0.20 hr.
03/28/19	Office conferences with Mr. Hibsher re: issues in case involving 30(b)(6)	
	C.M. SHUMADINE	0.30 hr.

03/29/19 Telephone conference with Ms. Goldman re: expert opinion use in motion for summary judgment and

discussion of argument of motion for summary judgment;

C.M. SHUMADINE 0.50 hr.

03/29/19 Email from Ms. Goldman and review objections to

Mr. Schaffer's second set of interrogatories;

C.M. SHUMADINE 0 10 hr

#### **March 2019 Summary of Fees**

**C.M. SHUMADINE:** 12.00 hrs. @ \$450/hr. \$ 5,400.00

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04/01/19 Review answers filed by defendants and email from

Mr. Girdner with his comments on answers:

C.M. SHUMADINE 0.20 hr.

04/02/19 Email from Ms. Goldman re: telephone call with

Mr. Girdner;

C.M. SHUMADINE 0.10 hr.

04/02/19 Email from Ms. Goldman with Mr. Schaefer's objections to

> second set of interrogatories, Mr. Schaefer's objections to third set of requests for production, Ms. Smith's objections to second set of interrogatories, and Ms.

Smith's objections to third set of requests for production;

C.M. SHUMADINE 0.30 hr.

04/04/19 Email from Ms. Goldman to Mr. Prince re: objections;

> C.M. SHUMADINE 0.10 hr.

04/04/19 Email from Ms. Goldman to Mr. Prince with supplemental

privilege log and review of supplemental privilege log;

C.M. SHUMADINE 0.10 hr.

04/12/19 Email from Mr. Hibsher re: discovery issues and a

possible motion to compel;

	C.M. SHUMADINE	0.20 hr.
04/12/19	Response to Mr. Hibsher's email pro re: pursuing a motion to compel;	viding advice
	C.M. SHUMADINE	0.40 hr.
04/12/19	Telephone conference with Mr. Hibs to compel and other issues in case in for summary judgment;	
	C.M. SHUMADINE	0.20 hr.
04/15/19	Email from Mr. Harrison with letter outlining discovery deficiencies perc	
	C.M. SHUMADINE	0.20 hr.
04/15/19	Email to Mr. Harrison with advice re Mr. Prince's complaints about discov	
	C.M. SHUMADINE	0.20 hr.
04/15/19	Review Bergano v. Virginia Beach a Mr. Harrison re: privilege for attorne	
	C.M. SHUMADINE	0.20 hr.
04/16/19	Review email from Ms. Goldman an and responses to Mr. Schaefer's seco	•
	C.M. SHUMADINE	0.20 hr.
04/16/19	Review email from Mr. Harrison wit and confer and analyze notes re: mee	
	C.M. SHUMADINE	0.20 hr.
04/16/19	Email to Mr. Hibsher, et al., re: issue the discovery of information re: the f	
	C.M. SHUMADINE	0.20 hr.
04/20/19	Email from Ms. Goldman with exper Mr. Prince and review expert report;	rt report from

	C.M. SHUMADINE	0.10 hr.
04/20/19	Email from Mr. Prince re: his claim to access to information regarding legal fees;	
	C.M. SHUMADINE	0.10 hr.
04/23/19	Email from Ms. Goldman with object responses to Mr. Schaefer's second s	
	C.M. SHUMADINE	0.20 hr.
04/23/19	Email from Ms. Aronholt with Schaobjections to plaintiff's second set of	
	C.M. SHUMADINE	0.20 hr.
04/23/19	Email from Mr. Harrison with suppl to interrogatories;	emental responses
	C.M. SHUMADINE	0.20 hr.
04/24/19	Email from and to Ms. Goldman re: brief;	summary judgment
	C.M. SHUMADINE	0.10 hr.
04/24/19	Telephone conference with Mr. Hibsher re: legal fees and summary judgment brief;	
	C.M. SHUMADINE	0.20 hr.
04/24/19	Office conference with Mr. Bryant r	re: issues in case;
	C.M. SHUMADINE	0.10 hr.
04/24/19	Email from Mr. Hibsher re: filing;	
	C.M. SHUMADINE	0.10 hr.
04/24/19	Email from Mr. Harrison with object	tions to discovery;
	C.M. SHUMADINE	0.20 hr.
04/24/19	Email to Mr. Harrison re: the custon in dealing with certain discovery issues	

	C.M. SHUMADINE	0.10 hr.
04/24/19	Follow-up email from Mr. Harrison re: local practices in the Eastern District;	
	C.M. SHUMADINE	0.10 hr.
04/25/19	Email from Ms. Goldman re: form of summary judgment and reply;	of motion for
	C.M. SHUMADINE	0.20 hr.
04/25/19	Review email from Mr. Harrison and draft of memorandum in support of motion for summary judgment and analyze arguments made;	
	C.M. SHUMADINE	1.80 hr.
04/25/19	Email to Mr. Hibsher, Ms. Goldmar Harrison re: discovery and suggestion	
	C.M. SHUMADINE	0.30 hr.
04/25/19	Email from and to Ms. Goldman re: filing of papers regarding the motion for summary judgment;	
	C.M. SHUMADINE	0.20 hr.
04/25/19	Telephone conference with Mr. Hibsher in regard to motion for summary judgment;	
	C.M. SHUMADINE	0.10 hr.
04/26/19	Review draft of memorandum in support of motion for summary judgment and prepare for filing, emails from and to Ms. Goldman re: filing and review issues re: filing and breaking up exhibits, file motion for summary judgment and memorandum in support;	
	C.M. SHUMADINE	5.90 hr.
04/29/19	Review papers filed by the clerks in memorandum in support of the clerk summary judgment and the support	ks' motions for
	C.M. SHUMADINE	1.90 hr.

04/29/19 Prepare courtesy copy of filing for Judge Morgan and analyze issues re: courtesy filing; C.M. SHUMADINE 0.30 hr. 04/29/19 Telephone conference with Mr. Hibsher, Mr. Harrison, and Ms. Goldman re: the filing and issues to be addressed in the response to the clerks' filing; C.M. SHUMADINE 0 30 hr 04/29/19 Email from Ms. Goldman re: sample opposition materials and look for sample opposition materials; C.M. SHUMADINE 0.20 hr. Review email from Ms. Goldman re: forms and 04/30/19 continue to search for forms; C.M. SHUMADINE 0.10 hr. 04/30/19 Email to Ms. Goldman re: forms and the attorneys' conference: C.M. SHUMADINE 0.20 hr. 04/30/19 Review files re: forms; C.M. SHUMADINE 0.20 hr. 04/30/19 Email from Ms. Aronholz with signed verification from Mr. Schaefer; C.M. SHUMADINE 0.10 hr. 04/30/19 Email to Ms. Goldman re: access questions to be addressed at trial; C.M. SHUMADINE 0.20 hr. **April 2019 Summary of Fees C.M. SHUMADINE:** 16.50 hrs. @ \$450/hr. \$ 7,425.00

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Email from Mr. Hibsher re: filing and trial strategy;

05/01/19

	C.M. SHUMADINE	0.20 hr.
05/01/19	Analyze filings re: issued raised by Mr. Hibsher;	
	C.M. SHUMADINE	0.20 hr.
05/01/19	Email from Mr. Prince re: attorneys' analyze issue;	fees issue and
	C.M. SHUMADINE	0.20 hr.
05/02/19	Email from Ms. Goldman re: the form for objections in opposition to summary judgment motions and rev past pleadings;	
	C.M. SHUMADINE	0.30 hr.
05/02/19	Email to Ms. Goldman re: Rule 56(control procedure;	e)(2) and normal
	C.M. SHUMADINE	0.10 hr.
05/03/19	Email from Mr. Hibsher to Mr. Prince responding to discovery of attorneys' fees expended in prosecution of the case;	
	C.M. SHUMADINE	0.10 hr.
05/07/19	Email from Ms. Goldman with Rebu and review of Rebuttal Expert Repo	
	C.M. SHUMADINE	0.90 hr.
05/07/19	Email from Mr. Hibsher and response re: lack of endorsement of Mr. Schaeffer by Virginian-Pilot and lack of coverage;	
	C.M. SHUMADINE	0.20 hr.
05/09/19	Email from Mr. Harrison with draft response to Mr. Harrison's initial qu	
	C.M. SHUMADINE	0.20 hr.
05/09/19	Review draft of Memorandum and s responses to Mr. Harrison;	end additional

	C.M. SHUMADINE	0.90 hr.	
05/10/19	Memorandum in Opposition to Plain	Continue review and analysis of draft Response Memorandum in Opposition to Plaintiff's Motions for Summary Judgment and emails from and to Bryan Cave attorneys regarding the draft;	
	C.M. SHUMADINE	1.80 hr.	
05/10/19	Email from Ms. Baxter re: trial date of from Ms. Goldman responding to Ms.	_	
	C.M. SHUMADINE	0.10 hr.	
05/10/19	Telephone conference with Ms. Baxt date postponement and asking for ex		
	C.M. SHUMADINE	0.20 hr.	
05/10/19	Email from and to Mr. Hibsher re: tr	ial date change;	
	C.M. SHUMADINE	0.10 hr.	
05/10/19	Email from Mr. Harrison and final rememorandum prior to filing;	eview of	
	C.M. SHUMADINE	0.80 hr.	
05/10/19	Review Clerk's Memorandum in Oppanalyze arguments made by Clerks;	position and	
	C.M. SHUMADINE	1.10 hr.	
05/12/19	Email from and to Mr. Hibsher re: m	noving trial date;	
	C.M. SHUMADINE	0.10 hr.	
05/14/19	Email from Ms. Baxter and forward et al., re: change of trial date;	to Mr. Hibsher,	
	C.M. SHUMADINE	0.10 hr.	
05/14/19	Email from Mr. Hibsher and to and free trial date;	rom Ms. Baxter	
	C.M. SHUMADINE	0.10 hr.	

05/14/19	Follow up email and telephone conference with Mr. Hibsher re: trial date;	
	C.M. SHUMADINE	0.20 hr.
05/14/19	Prepare reminder on deadline dates of scheduling order and coordinate with on the extension of the trial date and	Mr. Shumadine
	P. YODER	0.30 hr.
05/15/19	Telephone conference with Ms. Bax	ter re: trial date;
	C.M. SHUMADINE	0.20 hr.
05/15/19	Email and telephone conference with trial date;	n Mr. Hibsher re:
	C.M. SHUMADINE	0.10 hr.
05/15/19	Email from Mr. Harrison re: question	ns re: local practice;
	C.M. SHUMADINE	0.10 hr.
05/15/19	Email to Mr. Harrison responding to regarding local practice;	his questions
	C.M. SHUMADINE	0.20 hr.
05/15/19	Email from Mr. Hibsher and voicem	ail re: trial date;
	C.M. SHUMADINE	0.10 hr.
05/16/19	Telephone conference with Mr. Princover spacing;	ce re: his concern
	C.M. SHUMADINE	0.20 hr.
05/16/19	Follow up telephone conference with re: Mr. Prince's complaints;	n Mr. Hibsher
	C.M. SHUMADINE	0.20 hr.
05/16/19	Email from Mr. Harrison with Easter	rn District cases;
	C.M. SHUMADINE	0.20 hr.

05/16/19	Additional telephone conference with Mr. Hibsher re: how to proceed;		
	C.M. SHUMADINE	0.20 hr.	
05/17/19	Email from and to Ms. Goldman and send form motion and brief to Ms. Goldman;		
	C.M. SHUMADINE	0.30 hr.	
05/17/19	Email from Mr. Hibsher and review drafts and consider whether need to make the motion an emergency motion;		
	C.M. SHUMADINE	0.40 hr.	
05/17/19	Telephone conference with Mr. Hibs to Mr. Prince;	her re: call	
	C.M. SHUMADINE	0.20 hr.	
05/20/19	Email to Mr. Prince;		
	C.M. SHUMADINE	0.20 hr.	
05/20/19	Email to Mr. Hibsher and Ms. Goldman re: conversation with Mr. Prince;		
	C.M. SHUMADINE	0.20 hr.	
05/20/19	Telephone conference with Ms. Baxt	ter re: filings;	
	C.M. SHUMADINE	0.20 hr.	
05/20/19	File Motion and Memorandum;		
	C.M. SHUMADINE	0.20 hr.	
05/20/19	Additional telephone conference with claims and emails re: extension;	n Ms. Baxter re:	
	C.M. SHUMADINE	0.20 hr.	
05/20/19	Review order granting extension;		
	C.M. SHUMADINE	0.10 hr.	

05/20/19	Telephone conference with Mr. Hibsher re: issues relating to filing;		
	C.M. SHUMADINE	0.20 hr.	
05/22/19	Telephone conference with Mr. Hibsher re: replies and Motion for Substitution of Memoranda and issues related thereto;		
	C.M. SHUMADINE	0.20 hr.	
05/23/19	Email from Ms. Goldman with draft preliminary review of reply and exhi		
	C.M. SHUMADINE	0.90 hr.	
05/24/19	Continue review of draft of reply;		
	C.M. SHUMADINE	0.80 hr.	
05/24/19	Email to Ms. Goldman with commer	nts;	
	C.M. SHUMADINE	0.20 hr.	
05/24/19	Email from Mr. Hibsher and reply to re: comments;	Mr. Hibsher	
	C.M. SHUMADINE	0.10 hr.	
05/24/19	Review final of reply and exhibits and attachments;		
	C.M. SHUMADINE	0.70 hr.	
05/25/19	Review Reply filed by clerks;		
	C.M. SHUMADINE	0.90 hr.	
05/26/19	Continue review of clerks' Reply in Support of Motion for Summary Judgment and review of selected exhibits from Reply;		
	C.M. SHUMADINE	0.40 hr.	
05/28/19	Telephone conference with Hibsher re: Clerk's re oral argument and attorney's conference;		
	C.M. SHUMADINE	0.20 hr.	

05/28/19	Telephone conference with Mr. Prince re: oral argument and the details of his call to Ms. Baxter;		
	C.M. SHUMADINE	0.20 hr.	
05/28/19	Email from and to Mr. Hibsher re: attorney's conference;		
	C.M. SHUMADINE	0.20 hr.	
05/28/19	Calendar deadline dates from the Amended Scheduling Order to forward reminders of same to Mr. Shumadine;		
	P. YODER	0.60 hr.	
05/30/19	Email from and to Mr. Hibsher re: call to Ms. Baxter;		
	C.M. SHUMADINE	0.10 hr.	
05/30/19	Follow up email;		
	C.M. SHUMADINE	0.10 hr.	
05/30/19	Voicemail and telephone conference with Mr. Hibsher re: call to Ms. Baxter and issues regarding the call;		
	C.M. SHUMADINE	0.20 hr.	
05/30/19	Email to and from Mr. Hibsher following up on call to Ms. Baxter;		
	C.M. SHUMADINE	0.10 hr.	
05/30/19	Review replies filed by both parties re: evaluation of summary judgment motions;		
	C.M. SHUMADINE	0.50 hr.	

# May 2019 Summary of Fees

	<u>Hours</u>	Rate/Hr	Amount
C.M. SHUMADINE	17.40	450.00	7,830.00
P. YODER	90	155.00	139.50
	18.30		7,969.50

### **May 2019 Fees for Professional Services**

\$ 7,969.50

06/06/19 Email from Mr. Prince to Mr. Hibsher re: moving attorney's conference; C.M. SHUMADINE 0.10 hr. 06/06/19 Email from and to Mr. Hibsher re: logistics and conversation with Ms. Baxter re: Judge Morgan's plans and arrange for conference rooms for attorneys' conference; C.M. SHUMADINE 0.30 hr. 06/07/19 Email from Ms. Goldman re: motions in limine and trial briefs in Eastern District and response; 0.20 hr. C.M. SHUMADINE 06/07/19 Follow-up email and more detailed responses to Ms. Goldman's questions; C.M. SHUMADINE 0.20 hr. 06/13/19 Review order filing substituted memoranda and follow-up filings on PACER; C.M. SHUMADINE 0.10 hr. 06/25/19 Review Order re: supplementing the record; C.M. SHUMADINE 0.10 hr. **June 2019 Summary of Fees C.M. SHUMADINE:** 1.00 hr. @ \$450/hr. \$ 450.00 07/22/19 Telephone conference with Mr. Hibsher re: status of case and discussion of Judge Morgan's likely actions; C.M. SHUMADINE 0.20 hr. 07/22/19 Check on related issue and email to Mr. Hibsher; C.M. SHUMADINE 0.10 hr.

### **July 2019 Summary of Fees**

C.M. SHUMADINE: 0.30 hr. @ \$450/hr.					\$ 135.00			
	*	*	*	*	*	*	*	
08/19/19	Telephone confereturn;	erence v	with Ms	s. Baxte	r re: Jud	ge Mo	rgan's	
	C.M. SHUMAD	DINE			0.10 hr.			
08/19/19	Email to Mr. Hi	bsher, e	et al., re	: Judge	Morgan	ı's retur	m;	
	C.M. SHUMAD	DINE			0.10 hr.			
08/19/19	Email from Mr. draft response an			-	-			
	C.M. SHUMAD	DINE			0.50 hr.			
08/19/19	Email from and in the Eastern D		Goldma	an re: p	rocedure	utilize	ed	
	C.M. SHUMAD	DINE			0.20 hr.			
08/20/19	Review email from and logistics and and issues regard preparation of the	l email ding fin	to Ms. al preti	Goldma	an re: tri	al proc	edures	
	C.M. SHUMAD	DINE			0.40 hr.			
08/20/19	Coordinate with to Ms. Goldman at trial as presen	for tria	ıl exhib	-	_			
	P. YODER				0.50 hr.			
08/22/19	Meet with Ms. N presentation issu					cumen	t	
	C.M. SHUMAD	DINE			0.30 hr.			
08/22/19	Meeting with M preparation and							

N. MARTINEZ

0.90 hr.

08/22/19 Attend meeting with Mr. Shumadine and Ms. Martinez on assisting Ms. Goldman with trial preparation and using

Trial Director during the trial in October 2019;

P. YODER

0.90 hr.

08/23/19 Email from Ms. Yoder and discussion of document preparation;

C.M. SHUMADINE

0.20 hr.

08/23/19 Follow-up discussion with Ms. Yoder and email from

Ms. Yoder to Ms. Goldman;

C.M. SHUMADINE

0.20 hr.

08/23/19 Review issues re: videotaped depositions and email

to Ms. Goldman;

C.M. SHUMADINE

0.20 hr.

08/23/19 Assist Ms. Yoder with drafting of guidelines for processing

of transcripts and exhibits for court presentation;

N. MARTINEZ

0.40 hr.

08/23/19 Draft guidelines to be forwarded to Ms. Goldman

re: preparation of plaintiff and defendant trial exhibits and deposition transcripts for processing to load same into Trial Director and to print sets of plaintiff exhibits for the court and opposing counsel by the October 29th deadline date; coordinate with Ms. Martinez re: same;

P. YODER

0.90 hr.

#### **August 2019 Summary of Fees**

	<u>Hours</u>	Rate/Hr	Amount
C.M. SHUMADINE	2.20	450.00	990.00
P. YODER	2.30	155.00	356.50
N. MARTINEZ	1.30	210.00	273.00
TOTAL	5.80		\$1,619.50

**August 2019 Fees for Professional Services** 

\$1,619.50

	* * * *	* * *	
09/04/19	Email from and to Mr. Harrison re: local practice and office conference with Mr. Bryant re: local practice issues;		
	C.M. SHUMADINE	0.20 hr.	
09/05/19	Email to Mr. Hibsher, et al., re: loca Judge Morgan's local procedures;	l practice and	
	C.M. SHUMADINE	0.20 hr.	
09/05/19	Telephone call from Mr. Hibsher, M Goldman re: trial procedures in the I		
	C.M. SHUMADINE	0.40 hr.	
09/10/19	Email from and to Ms. Goldman re: issues;	attorneys' conference	
	C.M. SHUMADINE	0.20 hr.	
09/10/19	Email from and to Ms. Goldman re: and triable issues;	factual contentions	
	C.M. SHUMADINE	0.20 hr.	
09/11/19	Telephone conference with Mr. Harrison re: use of technology and re: meeting re: the use of technology;		
	C.M. SHUMADINE	0.20 hr.	
09/11/19	Telephone conference with Ms. Bax to demonstrate the technology availa		
	C.M. SHUMADINE	0.20 hr.	
09/11/19	Telephone conference and email to learn the meeting and office conference with		
	C.M. SHUMADINE	0.20 hr.	
09/12/19	Office conference with Ms. Yoder at Mr. Harrison re: electronic devices a		

C.M. SHUMADINE

0.20 hr.

09/12/19 Determine the requirements of the United States District Court for permission to bring electronic devices into the court for the October 7, 2019 courtroom technology meeting and the October 29, 2019 trial;

P. YODER

0.80 hr

O9/12/19 Complete the Request for Authorization form and Request to Use Court's Evidence Presentation System form and prepare letter to Judge Morgan forwarding same for execution and return;

P. YODER

1.00 hr.

09/13/19 Email from and to Mr. Harrison re: electronic devices in court and follow-up email;

C.M. SHUMADINE

0.20 hr.

09/13/19 Letter to court re: permission to bring computer to court for demonstration of technology;

C.M. SHUMADINE

0.10 hr.

09/13/19 Email from Mr. Hibsher and Mr. Prince re: telephone conference and reply email from Mr. Hibsher;

C.M. SHUMADINE

0.10 hr.

O9/13/19 Finalize requests to Judge Morgan for electronic devices to be permitted at trial and attorney's conference/courtroom technology meeting and forward to Judge Morgan for approval;

P. YODER

0.50 hr.

09/16/19 Email from Ms. Goldman re: meet and confer and research re: whether Judge Morgan has special rules as requested by Ms. Goldman;

C.M. SHUMADINE

0.40 hr.

09/24/19 Email from and to Ms. Goldman re: technology issues and deposition summaries;

	C.M. SHUMADINE	0.20 hr.
09/24/19	Follow-up email re: witness list and	depositions and response;
	C.M. SHUMADINE	0.20 hr.
09/25/19	Email from Ms. Goldman re: witness	s list and response;
	C.M. SHUMADINE	0.50 hr.
09/25/19	Follow-up email from Ms. Goldman	and response;
	C.M. SHUMADINE	0.10 hr.
09/25/19	Email from and to Ms. Goldman re: pretrial conference of Courthouse No.	
	C.M. SHUMADINE	0.40 hr.
09/25/19	Email from and to Ms. Goldman re: settlement conference being ordered	
	C.M. SHUMADINE	0.10 hr.
09/25/19	Review previous filings regarding questions regarding briefing and the filing of a trial brief and respond to Ms. Goldman;	
	C.M. SHUMADINE	0.10 hr.
09/25/19	Meeting with Ms. Yoder re: Pre Trial Disc and trial exhibits to load into TrialDirector to use in trial;	
	N. MARTINEZ	0.50 hr.
09/25/19	Coordinate with Ms. Martinez on Pre Trial Disclosures filed by plaintiff and defendant and anticipated electronic versions of same to load into Trial Director for use at trial;	
	P. YODER	0.50 hr.
09/26/19	Telephone conference with Ms. Gold regarding attorneys' conference;	lman re: issues

0.30 hr. C.M. SHUMADINE 09/26/19 Telephone conference with Ms. Goldman re: disclosures; C.M. SHUMADINE 0.10 hr. 09/26/19 Email to Ms. Goldman providing 26(a)(3) disclosure form utilized in another case and locate forms: C.M. SHUMADINE 0.10 hr. 09/27/19 Telephone conference with Ms. Goldman re: exhibit list; C M SHUMADINE 0 10 hr 09/27/19 Email from Ms. Goldman with draft Rule 26(a)(3) disclosures and emails to and from Ms. Goldman re: disclosures; C.M. SHUMADINE 0.20 hr. 09/27/19 Email from Ms. Rossi with defendant's 26(a)(3) disclosures and brief review of disclosures: C.M. SHUMADINE 0.30 hr. 09/27/19 Email from Ms. Goldman with exhibit list and additional email re: exhibit list; 0.30 hr. C.M. SHUMADINE 09/30/19 Office conference with Ms. Yoder re: computer access and email to and from Ms. Baxter re: computer access for technology review; 0 10 hr C.M. SHUMADINE 09/30/19 Email from Ms. Goldman with stipulated facts and review of stipulated facts: C.M. SHUMADINE 0.30 hr. 09/30/19 Email from Mr. Harrison with disclosures in WORD and review portions of disclosures; C.M. SHUMADINE 0.30 hr.

09/30/19 Email from Mr. Prince with disclosures in WORD and review portions of Mr. Prince's disclosures;

C.M. SHUMADINE

0.30 hr.

09/30/19 Meeting with Ms. Yoder re: deadline schedule and prep TrialDirector to load electronic exhibits for trial;

N. MARTINEZ

0.20 hr.

09/30/19 Two telephone conferences with Judge Morgan's Clerk and Ms. Baxter to follow up on the status of the executed

electronic device authorization and to obtain a copy of same;

P. YODER 0.20 hr.

09/30/19 Review plaintiff's Pre-trial Disclosures and coordinate with Ms. Martinez on the deadline schedule and obtaining

electronic versions of same in order to download into

Trial Director for use at trial;

P. YODER 0.90 hr.

## **September 2019 Summary of Fees**

	<u>Hours</u>	Rate/Hr	<u>Amount</u>
C.M. SHUMADINE	6.80	450.00	3,060.00
P. YODER	3.90	155.00	604.50
N. MARTINEZ	<u>0.70</u>	210.00	147.00
TOTAL	11.40		\$3,811.50

### **September 2019 Fees for Professional Services**

\$ 3,811.50

10/01/19 Email from Ms. Goldman re: stipulated facts and review

stipulated facts;

C.M. SHUMADINE 0.20 hr.

10/01/19 Download Plaintiff and Defendant exhibits from an

external link and prep to use in trial presentation software;

N. MARTINEZ 0.70 hr.

10/02/19	Email from Ms. Goldman re: logistics of attorneys' conference and response;	
	C.M. SHUMADINE	0.10 hr.
10/02/19	Email from Ms. Martinez and Ms. Y re: exhibits;	oder and Ms. Weiss
	C.M. SHUMADINE	0.10 hr.
10/02/19	Review materials to be discussed at	attorneys' conference;
	C.M. SHUMADINE	0.10 hr.
10/02/19	Conference call with Ms. Weiss and Ms. Yoder re: missing electronic exhibits and loading to trial presentation software; assign Plaintiff's exhibit stamps;	
	N. MARTINEZ	3.80 hr.
10/02/19	Attend telephone conference with Ms. Weiss and Ms. Martinez re: electronic trial exhibits and loading same into Trial Director;	
	P. YODER	0.50 hr.
10/03/19	Email from Ms. Goldman re: attorneys' conference logistics and response;	
	C.M. SHUMADINE	0.10 hr.
10/03/19	Email from Ms. Martinez and Ms. Y	oder re: electronic exhibits;
	C.M. SHUMADINE	0.10 hr.
10/03/19	Continue to assign Plaintiff's exhibit	t stamps to trial exhibits;
	N. MARTINEZ	1.60 hr.
10/03/19	Receipt of Plaintiff's exhibit binders from Ms. Weiss containing exhibits 13-27 and organize 2 sets of binders for use at the attorney's conference on October 7, 2019;	
	P. YODER	0.80 hr.
10/03/19	Coordinate with Ms. Weiss on deposition shipped for attorneys conference and	

courthouse technology review meeting with Ms. Baxter	
at the USDC;	

P. YODER

0.30 hr.

10/04/19 Email from Ms. Goldman with draft objections, review of objections, and email Ms. Goldman with reactions to objections;

C.M. SHUMADINE

0.30 hr.

10/04/19 Follow-up email from Ms. Goldman and response re:

objections;

C.M. SHUMADINE

0.20 hr.

10/04/19 Continue to assign Plaintiff's exhibit stamps to trial exhibits;

N. MARTINEZ

1.30 hr.

10/06/19 Review defendants' objections to exhibits, et al.;

C.M. SHUMADINE

0.20 hr.

10/06/19 Meeting with Mr. Hibsher, Mr. Harrison and Ms. Goldman, including preparation of Ms. Rardin, CNS's reporter re:

her testimony at trial;

C.M. SHUMADINE

3.60 hr.

10/07/19 Email from Ms. Goldman and prepare documents for the

meeting with Ms. Goldman, Mr. Hibsher and Mr. Harrison;

C.M. SHUMADINE

0.20 hr.

10/07/19 Meeting with Mr. Hibsher, Ms. Goldman and Mr. Harrison

and participate in attorneys' conference with Mr. Prince and Mr. Matheson and review and revise notes on final

pretrial order;

C.M. SHUMADINE

3.50 hr.

10/07/19 Meeting with Ms. Baxter and all counsel at the courthouse

relating to the use of technology in the courtroom;

C.M. SHUMADINE

0.90 hr.

10/07/19	Prep trial equipment and attend technology meeting at Federal Court with Mr. Shumadine and co-counsel;	
	N. MARTINEZ	1.70 hr.
10/07/19	Attend the pretrial attorneys conference and the technology review meeting with Ms. Baxter at the United States District Court;	
	P. YODER	1.50 hr.
10/07/19	Gather Pretrial Order templates and	forward to Ms. Goldman;
	P. YODER	1.70 hr.
10/07/19	Maintain file with boxes of document conference;	ats used at the attorneys'
	P. YODER	1.90 hr.
10/08/19	Email to Mr. Hibsher, et al., re: Judge Morgan's hearing and response from Mr. Hibsher;	
	C.M. SHUMADINE	0.10 hr.
10/08/19	Email from and to Ms. Goldman re: courtroom procedure in the Eastern District;	
	C.M. SHUMADINE	0.20 hr.
10/08/19	Office conference with Ms. Yoder repretrial order draft;	e: preparation of final
	C.M. SHUMADINE	0.10 hr.
10/08/19	Locate sample Pretrial Order and forward same to Ms. Goldman;	
	P. YODER	0.40 hr.
10/09/19	Email from Ms. Goldman re: final pretrial order draft and office conference with Ms. Yoder re: draft and review issues re: specific parts of the final pretrial order draft;	
	C.M. SHUMADINE	0.40 hr.

10/09/19	Email from Mr. Prince re: deposition summonses;	
	C.M. SHUMADINE	0.10 hr.
10/09/19	Email from Ms. Goldman and response re: deposition excerpts and office conference with Ms. Yoder;	
	C.M. SHUMADINE	0.10 hr.
10/09/19	Review Proposed Final Pretrial Order received from Ms. Goldman for accuracy of Plaintiff and Defendant Trial Exhibits revisions at the attorney's conference;	
	P. YODER	3.50 hr.
10/09/19	Telephone conference with Ms. Gold revisions to same;	dman re:
	P. YODER	0.10 hr.
10/10/19	Email from Ms. Goldman to Mr. Prince re: final pretrial order;	
	C.M. SHUMADINE	0.10 hr.
10/10/19	Review email from Mr. Harrison re: OES subpoena and office conference with Ms. Yoder and sign subpoena;	
	C.M. SHUMADINE	0.10 hr.
10/10/19	Email from Ms. Goldman and from Mr. Prince re: stipulation and review briefly the stipulation;	
	C.M. SHUMADINE	0.10 hr.
10/10/19	Email from and to Mr. Harrison re:	OES subpoena;
	C.M. SHUMADINE	0.10 hr.
10/10/19	Email from Ms. Goldman with draft of final pretrial order and review of final pretrial order;	
	C.M. SHUMADINE	0.20 hr.
10/10/19	Re-number Plaintiff's and Defendant list;	's exhibits from updated

	N. MARTINEZ	0.80 hr.
10/10/19	Review deposition designations and list of re-numbered trial exhibits in the Final Pretrial Order and coordinate revisions to same with Ms. Goldman;	
	P. YODER	1.20 hr.
10/10/19	Revise trial subpoena to office of the Supreme Court of Virginia, add a Count calculate the witness fee and m Mr. Harrison re: same;	Certificate of Service
	P. YODER	1.30 hr.
10/11/19	Email from Mr. Harrison to Ms. Mr. re: OES subpoena;	yers and Mr. Prince
	C.M. SHUMADINE	0.10 hr.
10/11/19	Continue to re-number Plaintiff's and Defendant's exhibits and upload to external link and send to co-counsel;	
	N. MARTINEZ	2.80 hr.
10/11/19	Coordinate with Ms. Martinez on re-numbered trial exhibits and arrange for copies of the exhibits with objections for use at the pre-trial conference;	
	P. YODER	1.20 hr.
10/14/19	Email from Mr. Prince, Ms. Goldm response re: call;	an and Mr. Prince's
	C.M. SHUMADINE	0.10 hr.
10/14/19	Email from Ms. Goldman re: factual contentions and triable issues and response re: triable issues after review of draft;	
	C.M. SHUMADINE	0.60 hr.
10/15/19	Email from Mr. Prince and Ms. Go facts;	ldman re: stipulated

0.10 hr.

C.M. SHUMADINE

10/15/19	Telephone conferences and emails from Mr. Harrison;	
	C.M. SHUMADINE	0.30 hr.
10/15/19	Office conferences with Ms. Yoder to arrange service of trial subpoena on OES;	
	C.M. SHUMADINE	0.10 hr.
10/15/19	Email from Ms. Goldman and arrang room for meeting;	ge for extra conference
	C.M. SHUMADINE	0.10 hr.
10/15/19	Email from Ms. Goldman to Mr. Prinorder;	nce re: final pretrial
	C.M. SHUMADINE	0.10 hr.
10/15/19	Continue to re-number, assign exhib exhibits and send to co-counsel;	it stamps to joint
	N. MARTINEZ	2.60 hr.
10/15/19	Revise trial subpoena and certificate of service to the Director, Judicial Information Technology at the Office of the Executive Secretary at the Supreme Court of Virginia;	
	P. YODER	0.20 hr.
10/15/19	Arrange expedited service of same with Mr. Hagood at the Wesley Group in Richmond and forward subpoena electronic transmission;	
	P. YODER	0.40 hr.
10/15/19	Prepare letter to the Director, Judicial Information Technology at the Office of the Executive Secretary at the Supreme Court of Virginia forwarding the mileage fee and witness fee checks;	
	P. YODER	0.30 hr.
10/15/19	Request fee checks for same;	

	P. YODER	0.20 hr.
10/15/19	Forward subpoena to defense counsel;	
	P. YODER	0.10 hr.
10/15/19	Review electronic set of trial exhibit	ts to ensure accuracy;
	P. YODER	1.30 hr.
10/15/19	Review attempted service of the subpoena on the Directo Judicial Information Technology at the Office of the Executive Secretary at the Supreme Court of Virginia and coordinate with Mr. Shumadine and the Wesley Group authorizing a second service attempt;	
	P. YODER	0.20 hr.
10/16/19	Email from Ms. Goldman to Mr. Pri order and email to Ms. McCloud wi	-
	C.M. SHUMADINE	0.10 hr.
10/16/19	Meeting with Ms. Goldman, Mr. Harrison and Mr. Hibsher re: movement of time for the final pretrial conference;	
	C.M. SHUMADINE	0.40 hr.
10/16/19	Second meeting with Mr. Hibsher, Mr. Harrison and Ms. Goldman and office conferences with Ms. Yoder re: OES subpoena and respond to questions re: local procedu in light of the movement of the conference;	
	C.M. SHUMADINE	0.30 hr.
10/16/19	Email from Judge Morgan's assistante: moving pretrial conference;	at and PACER order
	C.M. SHUMADINE	0.10 hr.
10/16/19	Email from Ms. Goldman to Mr. Pri additional documents re: stipulation	
	C.M. SHUMADINE	0.10 hr.

10/16/19	Review cross examination witness sheets to prepare exhibits for trial presentation;	
	N. MARTINEZ	0.20 hr.
10/16/19	Coordinate with Ms. Martinez on Coexhibits for various witnesses received	
	P. YODER	0.40 hr.
10/16/19	Telephone conference with the Wesley Group to confirm service of the subpoena on the Director at the Office of the Executive Secretary at the Virginia Supreme Court;	
	P. YODER	0.10 hr.
10/17/19	Continue review cross examination exhibits and other documents to trial	
	N. MARTINEZ	0.50 hr.
10/18/19	Email from Mr. Prince and review s to Mr. Prince's email;	tipulated facts attached
	C.M. SHUMADINE	0.10 hr.
10/18/19	Office conference with Ms. Yoder re: filing OES subpoena;	
	C.M. SHUMADINE	0.10 hr.
10/18/19	Email from Ms. Aronholt re: subpoenas issues by defendants and review of subpoenas;	
	C.M. SHUMADINE	0.10 hr.
10/18/19	Email from Ms. Goldman and respo subpoena clients;	nse re: need to
	C.M. SHUMADINE	0.20 hr.
10/18/19	Continue to review cross examination witness sheets and load documents to trial presentation software;	
	N. MARTINEZ	1.70 hr.
10/18/19	Electronically file the Return of Serv	vice received from

the Wesley Group for Mike Riggs at the Office of the
Executive Secretary, Supreme Court of Virginia with the
United States District Court through the ECF system;

P. YODER

0.30 hr.

10/19/19 Email from Mr. Hibsher, et al., re: proposed findings of fact and conclusions of law:

C.M. SHUMADINE

0 20 hr

10/21/19 Email from Ms. Goldman with proposed findings of fact and conclusions of law and review proposed findings of fact and conclusions of law and send brief comments to Ms. Goldman;

C.M. SHUMADINE

0.60 hr.

10/21/19 Continue to load exhibits and documents to trial presentation software;

N. MARTINEZ

1.30 hr.

10/21/19 Coordinate with Mr. Shumadine and Ms. Goldman re: printing sets of plaintiff trial exhibits for the court, defense counsel and plaintiff's counsel;

P. YODER

0.10 hr.

10/21/19 Review the electronic set of stamped trial exhibits of the Plaintiff and Defendants for accuracy;

P. YODER

2.80 hr.

10/21/19 Two telephone conferences with Ms. Weiss;

P. YODER

0.20 hr.

10/22/19 Email from Ms. Goldman to Mr. Prince and reply re: call;

C.M. SHUMADINE

0.10 hr.

10/22/19 Email from Mr. Prince with proposal for final pretrial order and review proposal;

C.M. SHUMADINE

0.10 hr.

10/22/19	Questions from Ms. Goldman re: page limits on filings other than briefs and review issues and respond;		
	C.M. SHUMADINE	0.20 hr.	
10/22/19	Email from Ms. Baxter, Ms. McCloud and to Ms. Baxter: moving of trial;		
	C.M. SHUMADINE	0.30 hr.	
10/22/19	Follow-up emails re: moving of tria	1;	
	C.M. SHUMADINE	0.10 hr.	
10/22/19	Telephone conference with Mr. Hib	phone conference with Mr. Hibsher re: trial date;	
	C.M. SHUMADINE	0.20 hr.	
10/22/19	Continue review additional cross ex sheet to prepare exhibits for trial pre		
	N. MARTINEZ	0.30 hr.	
10/22/19	Arrange for an oversee printing of 6 sets of trial for the Joint Exhibits and Plaintiff Exhibits and of the Defendant exhibits;		
	P. YODER	0.50 hr.	
10/22/19	Review the Proposed Findings of Facts and Conclusion of Law for electronic filing;		
	P. YODER	0.40 hr.	
10/23/19	Email to Mr. Hibsher, et al., re: trial date and reply;		
	C.M. SHUMADINE	0.10 hr.	
10/23/19	Email from Mr. Harrison and Ms. Myers at Attorney General's Office re: OES subpoena;		
	C.M. SHUMADINE	0.10 hr.	
10/23/19	Telephone conference with Mr. Hibsher and Ms. Goldman re: resetting of case and issues in case;		

C.M. SHUMADINE 0.20 hr.

10/23/19 Email from and to Mr. Prince re: issues re: continuance

and new trial date;

C.M. SHUMADINE 0.10 hr.

10/23/19 Email from Judge Morgan's assistant and review

entry on PACER;

C.M. SHUMADINE 0.10 hr.

10/24/19 Analyze issues in light of continuance and review of

materials that were going to be filed;

C.M. SHUMADINE 0.30 hr.

10/25/19 Brief review of draft of Findings of Fact and Conclusions

of Law and email to Mr. Hibsher, et al., with reactions;

C.M. SHUMADINE 0.30 hr.

#### October 2019 Summary of Fees

	<u>Hours</u>	Rate/Hr	<u>Amount</u>
C.M. SHUMADINE	17.20	450.00	7,740.00
P. YODER	21.90	155.00	3,394.50
N. MARTINEZ	<u>19.30</u>	210.00	4,053.00
TOTAL	58.40		\$15,187.50

#### October 2019 Fees for Professional Services

\$ 15,187.50

11/06/19 Prepare a revised authorization form, due to the case continuance, for permission to bring electronic equipment into the courtroom at trial and prepare letter to Judge

Morgan forwarding same;

P. YODER 0.50 hr.

11/08/19 Revise letter to Judge Morgan re: request for electronic devices at trial, forward to counsel and arrange for delivery

to the United States District Court;

	P. YODER	0.40 hr.	
11/14/19	Review 6 sets of Plaintiff's trial exhibits for accuracy and coordinate with DTI on revisions to same;		
	P. YODER	4.40 hr.	
11/15/19	Revise deadline dates due to case co reminder dates and forward dates to		
	P. YODER	1.10 hr.	
11/21/19	Receipt of executed IT clearance aut Ms. Baxter, coordinate on same to v is needed on the form, and revise for	erify if IT clearance	
	P. YODER	0.80 hr.	
November 2019 Summary of Fees			
P. YODER	7.20 hr. @ \$1	\$ 1,116.00	
	* * * *	* * *	
01/03/20	Email from Mr. Prince's office with Porter, Smith, Hawks, Schaefer and	-	
	C.M. SHUMADINE	0.10 hr.	
01/03/20	Forward reminder of upcoming Fina conference to Mr. Shumadine;	ıl Pretrial	
	P. YODER	0.10 hr.	
01/07/20	Email from and to Ms. Goldman re: re: logistics;	her telephone call	
	C.M. SHUMADINE	0.10 hr.	
01/08/20	Prepare for call with Ms. Goldman a	and Mr. Hibsher;	
	C.M. SHUMADINE	0.20 hr.	
01/08/20	Telephone conference with Mr. Hibs Goldman re: issues raised re: local p		

	C.M. SHUMADINE	0.30 hr.	
01/08/20	Email to and from Ms. Myers re: OES subpoena;		
	C.M. SHUMADINE	0.10 hr.	
01/08/20	Email from Ms. Goldman re: logistic	es;	
	C.M. SHUMADINE	0.10 hr.	
01/08/20		il to Ms. Yoder re: service of subpoena to OES and ow-up conversations with Ms. Yoder;	
	C.M. SHUMADINE	0.10 hr.	
01/08/20	Prepare trial subpoena to the Directo Technology, Office of the Executive letter forwarding witness and mileag request check for same and coordina	Secretary, prepare e fees check to same,	
	P. YODER	1.10 hr.	
01/08/20	Continued review of multiple sets of Plaintiff trial exhibits in preparation for the Final Pretrial conference on January 16, 2020; oversee revisions to various exhibits and review sets to ensure accuracy;		
	P. YODER	4.80 hr.	
01/09/20	Execute OES subpoena and office conference with Ms. Yoder re: service of subpoena;		
	C.M. SHUMADINE	0.10 hr.	
01/10/20	Email from Ms. Goldman re: logistic and review response from Ms. Martin		
	C.M. SHUMADINE	0.10 hr.	
01/10/20	Revise trial joint-exhibits and prep trail presentation software with same;		
	N. MARTINEZ	1.00 hr.	
01/10/20	Review documents forwarded to our 2019 from Ms. Goldman's office for		

that was cancelled and telephone conference with Ms. Weiss re: contents and determine if binders needed for the Pretrial Conference on January 16, 2020;

P. YODER

1.40 hr.

01/13/20 Communication with Ms. Weiss re: receive and review witness sheets with exhibits for trial prep meeting;

N. MARTINEZ

1.50 hr.

O1/13/20 Continue to review Plaintiff Exhibit binders to ensure replacement pages are accurate;

P. YODER

1.90 hr.

O1/14/20 Continue to review witness sheets to gather exhibits for trial prep meeting;

N. MARTINEZ

0.60 hr.

O1/14/20 Continue review of trial binders for plaintiff exhibits, joint exhibits and Defendant exhibits;

P. YODER

1.80 hr.

01/15/20 Review email from Ms. Goldman to Mr. Prince and follow-up re: edits to final pretrial order;

C.M. SHUMADINE

0.10 hr.

01/15/20 Meeting with Mr. Hibsher and Ms. Goldman and participate with both in conference call with Mr. Girdner;

C.M. SHUMADINE

0.50 hr.

O1/15/20 Follow-up conversations related to logistics and relating to preparation of final pretrial order and questions regarding final pretrial order;

C.M. SHUMADINE

1.00 hr.

01/15/20 Meet with trial team for demonstration of electronic exhibits presentation;

N. MARTINEZ

2.00 hr.

01/15/20	Organize notebooks delivered from outside counsel for pretrial conference preparation;	
	P. YODER	1.30 hr.
01/15/20	Forward reminder to Mr. Shumadine and 27, 2020 deadline dates;	re: January 21
	P. YODER	0.10 hr.
01/15/20	Attend IT meeting with Ms. Goldman and Mr. Hibsher to review exhibits to be presented at the trial in electronic format through Trial Director;	
	P. YODER	1.10 hr.
01/16/20	Prepare for final pretrial conference;	
	C.M. SHUMADINE	0.30 hr.
01/16/20	Review Final Pretrial Order;	
	C.M. SHUMADINE	0.40 hr.
01/16/20	Meeting with Mr. Hibsher and Ms. Goldman regarding issues at Final Pretrial Conference and regarding issues at trial;	
	C.M. SHUMADINE	0.90 hr.
01/16/20	Final Pretrial Conference before Judge Morgan;	
	C.M. SHUMADINE	3.00 hr.
01/16/20	Meeting with Mr. Hibsher, Ms. Goldman and calls to Mr. Girdner, California counsel and Mr. Harrison and meeting with Ms. Yoder and Ms. Martinez re: issues at trial;	
	C.M. SHUMADINE	1.50 hr.
01/16/20	Design callouts of transcripts from d presentation;	esignations to use in courtroom
	N. MARTINEZ	1.80 hr.
01/16/20	Assist Ms. Goldman and Mr. Hibshe	r in pretrial conference

preparation, arrange for copies of exhibits for the pretrial conference, attend the pretrial conference at the United States District Court, contact Mr McManus at the United States District Court to order the transcript of same, retrieve the material and documents used at the pretrial conference and organize and store same for Ms. Goldman's and Mr. Hibsher's future return for trial preparation;

P. YODER

4.40 hr.

01/17/20 Email from Mr. Hibsher and telephone conference with Mr. McManus, court reporter, and see that transcript is sent to Mr. Hibsher, et al.;

C.M. SHUMADINE

0.20 hr.

01/17/20 Review law and attorneys' fee awards and send to Mr. Hibsher;

C.M. SHUMADINE

0.30 hr.

01/17/20 Telephone call from Mr. Girdner re: hearing, Planet decision, and future actions and Judge Morgan's opinion;

C.M. SHUMADINE

0.60 hr.

01/17/20 Email from and to Ms. Goldman re: expedited transcripts;

C.M. SHUMADINE

0.10 hr.

O1/17/20 Two telephone conferences with Mr. McManus at the United States District Court re: Pretrial conference transcript and email same to Ms. Goldman and Mr. Hibsher and request check for payment of invoice for same;

P. YODER

0.40 hr.

01/17/20 Email Mr. McManus at the United States District Court for clarification on expedited vs. same day trial transcript request and coordinate same with Ms. Goldman;

P. YODER

1.00 hr.

01/17/20 Print the final Pretrial Order issued by Judge Morgan;

P. YODER

0.10 hr.

01/18/20	Review transcript of final pretrial conference;	
	C.M. SHUMADINE	0.40 hr.
01/18/20	Review email from Mr. Girdner and clerks provided as attachments to Mr.	
	C.M. SHUMADINE	0.20 hr.
01/18/20	Review and analyze Planet decision provided by Mr. Girdner;	which had been
	C.M. SHUMADINE	0.30 hr.
01/19/20	Email to attorneys and Mr. Girdner r to Mr. Girdner's question;	e: responses
	C.M. SHUMADINE	0.20 hr.
01/20/20 Email from Ms. Goldman with Findings of Fact a Conclusions of Law and email to Mr. Hibsher, et re: questions asked by Ms. Goldman;		. Hibsher, et al.,
	C.M. SHUMADINE	0.40 hr.
01/21/20	Office conference with Ms. Yoder re and Conclusions of Law;	: Findings of Fact
	C.M. SHUMADINE	0.10 hr.
01/21/20	Emails from and to Ms. Goldman an	d Ms. Yoder re: logistics;
	C.M. SHUMADINE	0.10 hr.
01/21/20	Telephone conference with Ms. Baxt	ter re: OES subpoena;
	C.M. SHUMADINE	0.10 hr.
01/21/20	Final review of Findings of Fact and	Conclusions of Law;
	C.M. SHUMADINE	0.30 hr.
01/21/20	Email from Ms. Goldman and review Morgan's schedule;	v of docket and Judge
	C.M. SHUMADINE	0.20 hr.

01/21/20	Continue to design callouts of transcripts from designations to use in courtroom presentation;	
	N. MARTINEZ	2.10 hr.
01/21/20	Coordinate with Mr. McManus and expedited vs. daily transcripts during	
	P. YODER	0.20 hr.
01/21/20	Continue to review multiple copies of for accuracy;	of trial exhibit binders
	P. YODER	2.40 hr.
01/21/20	Assist with electronically filing the land Conclusions of Law with the Ur	•
	P. YODER	0.50 hr.
01/21/20	Coordinate with Ms. Goldman and Ms. Baxter at the United States District Court re: required number of trial exhibit binders to be filed on January 27, 2020 with the Clerk's office;	
	P. YODER	0.40 hr.
01/21/20	File the return of service electronically for the subpoena to the Office of Executive Secretary with the Supreme Court of Virginia;	
	P. YODER	0.40 hr.
01/22/20	Email from and to Ms. Goldman re:	logistics;
	C.M. SHUMADINE	0.10 hr.
01/22/20	Continue to design callouts of transc to use in courtroom presentation;	eripts from designations
	N. MARTINEZ	2.90 hr.
01/22/20	Confirm with Ms. Goldman that def of Plaintiff trial exhibits as required	1.5
	P. YODER	0.30 hr.
01/22/20	Finalize review and revisions to mul	tiple sets of Plaintiff and

	joint trial exhibits for filing with the court;		
	P. YODER	3.60 hr.	
01/23/20	Email from Ms. Goldman and from Ms. Myers re: OES subpoena and responses to both and voicemail to Ms. Baxter;		
	C.M. SHUMADINE	0.30 hr.	
01/23/20	Email from Mr. Prince and Judge M	organ's law clerk re: logistics;	
	C.M. SHUMADINE	0.10 hr.	
01/23/20	Continue to design callouts of transc to use in courtroom presentation;	eripts from designations	
	N. MARTINEZ	3.60 hr.	
01/23/20	Email Ms. Goldman re: conference repreparation and availability to assist		
	P. YODER	0.20 hr.	
01/24/20	Email from and to Mr. Harrison responding to questions on local practice;		
	C.M. SHUMADINE	0.30 hr.	
01/24/20	Office conference with Ms. Yoder re: logistics involved in the case;		
	C.M. SHUMADINE	0.10 hr.	
01/24/20	Email communications with Ms. Weiss, continue to design callouts of transcripts from designations and import same to trial presentation software to use in courtroom presentation;		
	N. MARTINEZ	4.30 hr.	
01/24/20	O Coordinate with Ms. Goldman and Ms. Weiss on boxes shipped to our office for trial preparation;		
	P. YODER	0.40 hr.	
01/24/20	Load boxes received from counsel in	nto the conference	

	room for trial preparation;	
	P. YODER	1.50 hr.
01/24/20	Coordinate with Mr. Harris on preparto be read in at trial for witness Elfo	
	P. YODER	0.20 hr.
01/25/20	Email from and to Ms. Matteo-Boel and Ms. McCloud re: Ms. Matteo-B	
	C.M. SHUMADINE	0.10 hr.
01/26/20	Meetings with Mr. Hibsher, Ms. Go Mr. Girdner, Mr. Abbott and Ms. W	· · · · · · · · · · · · · · · · · · ·
	C.M. SHUMADINE	5.10 hr.
01/26/20	Continue to design callouts of transcripts from designations and import same to trial presentation software to use in courtroom presentation;	
	N. MARTINEZ	1.50 hr.
01/26/20	Trial preparation with attorney Harr designations to be read in at trial for	-
	P. YODER	1.00 hr.
01/27/20	Email to and from Mr. Protogyrou a Hibsher, et al., re: criminal trial;	and email to Mr.
	C.M. SHUMADINE	0.20 hr.
01/27/20	Meetings with Mr. Hibsher, Mr. Ha Mr. Girdner and Mr. Abbott re: trial	
	C.M. SHUMADINE	0.80 hr.
01/27/20	Emails from and to Ms. Yoder and	Ms. Baxter re: logistics;
	C.M. SHUMADINE	0.20 hr.
01/27/20	Continue to design callouts of transc and import same to trial presentation	-

	courtroom presentation;	
	N. MARTINEZ	0.90 hr.
01/27/20	Assist Ms. Goldman and Ms. Weiss	s with trial preparation;
	P. YODER	2.90 hr.
01/27/20	Prepare 2 sets of six witness notebo required by Judge Morgan for use a	
	P. YODER	3.10 hr.
01/27/20	Coordinate with Ms. Baxter at the U Court on the trial exhibits and trial Morgan's overlapping criminal trial	continuance due to Judge
	P. YODER	0.40 hr.
01/28/20	Office conferences with Mr. Girdner, Mr. Hibsher, Ms. Goldman and Mr. Harrison re: logistical and legal issues expected at trial;	
	C.M. SHUMADINE	0.90 hr.
01/28/20	Telephone call from Judge Morgan	s assistant;
	C.M. SHUMADINE	0.10 hr.
01/28/20	Telephone conference with court;	
	C.M. SHUMADINE	0.20 hr.
01/28/20	Telephone conference with Mr. Prin with court;	nce re: telephone call
	C.M. SHUMADINE	0.20 hr.
01/28/20	Review notice from court, email fro and respond to Mr. Prince;	m Mr. Prince
	C.M. SHUMADINE	0.30 hr.
01/28/20	Office conference with Ms. Goldmare: status of trial;	an and call to Mr. Hibsher

	C.M. SHUMADINE	0.20 hr.
01/28/20	Review issues relating to Mr. Prince	s's email and his complaint;
	C.M. SHUMADINE	0.30 hr.
01/28/20	Update trial laptop with final callout with displaying trial exhibits for pre	
	N. MARTINEZ	3.20 hr.
01/28/20	Review 2 sets of six witness notebook assemble notebooks with Plaintiff, I designations on the dividers;	
	P. YODER	1.40 hr.
01/28/20	Assist Mr. Weiss with trial preparati with trial exhibits and designations;	on and Ms. Martinez
	P. YODER	1.50 hr.
01/28/20	Telephone conference with the U.S. Marshall's office at the United States District Court-Norfolk re: gaining access to the secured gate on Brambleton Avenue for delivery of boxes for trial on Thursday;	
	P. YODER	0.20 hr.
01/29/20	Email from Ms. Baxter re: trial date	
	C.M. SHUMADINE	0.10 hr.
01/29/20	Email from Mr. Prince and discuss response to Mr. Prince with Mr. Hibsher, Mr. Girdner, Mr. Harrison and Ms. Goldman;	
	C.M. SHUMADINE	0.60 hr.
01/29/20	Meetings with Mr. Hibsher, Ms. Goldman, Mr. Harrison, Mr. Girdner and Mr. Abbott re: issues to arise at trial;	
	C.M. SHUMADINE	0.60 hr.
01/29/20	Office conferences with Mr. Girdner questions regarding the use of Court	

	C.M. SHUMADINE	0.20 hr.
01/29/20	Emails from Ms. Baxter and office conference with Mr. Girdner, Ms. Goldman and Mr. Harrison re: emails and trial date;	
	C.M. SHUMADINE	0.40 hr.
01/29/20	Additional analysis re: potential resp questions re: telephone call;	oonse to Mr. Prince's
	C.M. SHUMADINE	0.20 hr.
01/29/20	Revise witness notebooks for Amita	Kancherla;
	P. YODER	0.70 hr.
01/29/20	Attempted telephone conference with the U.S. Marshall's office at the United States District Court to arrange for delivery of trial boxes to the United States District Court through the secured entrance to the court and telephone conference with Ms. Baxter in Judge Morgan's office re: same;	
	P. YODER	0.30 hr.
01/29/20	Assist Ms. Weiss with copies of multiple documents;	
	P. YODER	0.20 hr.
01/30/20	Office conference with Ms. Yoder re: logistics issues regarding access to the court and what should be taken;	
	C.M. SHUMADINE	0.20 hr.
01/30/20	Email from Ms. Myers re: Mr. Rigg response from Ms. Goldman;	s' subpoena and
	C.M. SHUMADINE	0.10 hr.
01/30/20	Additional office conferences with Ms. Martinez, Ms. Goldman, et al.,	
	C.M. SHUMADINE	0.50 hr.
01/30/20	Review supplemental authority filed	l by defendant;

C.M. SHUMADINE

0.20 hr.

01/30/20 Continue to update trial laptop with additional transcripts callout and test same:

N. MARTINEZ

1.60 hr.

01/30/20 Two telephone conferences with Ms. Annan at the U.S.

Marshall's office and two emails sending confirmation re: access to secured gate at the United States District Court for courier to deliver boxes of documents for use at trial on January 31, 2020 and coordinate same with courier

for delivery to the court;

P. YODER

0.60 hr.

01/30/20 Assist Ms. Weiss with trial preparation;

P. YODER

2.60 hr.

01/31/20 First day of trial of case before Judge Morgan in federal

court and meetings with lead counsel and clients;

C.M. SHUMADINE

7.40 hr.

01/31/20 Set up technology in courtroom and assist trial team

with displaying electronic trial exhibits;

N. MARTINEZ

6.50 hr.

01/31/20 Oversee transporting boxes of trial materials to the

United States District Court for trial and attend trial:

P. YODER

7.40 hr.

01/31/20 Assist Ms. Weiss and Ms. Goldman with duplicating

various documents as needed;

P. YODER

0.40 hr.

#### **January 2020 Summary of Fees**

	<u>Hours</u>	Rate/Hr	<u>Amount</u>
C.M. SHUMADINE	32.40	450.00	14,580.00
P. YODER	52.30	160.00	8,368.00

N. MARTIN TOTAL	EZ <u>33.50</u> 215.00 <u>7,202.50</u> 118.20 \$30,150.50		
January 2020 Fees for Professional Services \$ 30,150.50			
	* * * * * * *		
02/01/20	Review transcript of first day of trial of case and prepare notes re: issues to be addressed in the remainder of trial;		
	C.M. SHUMADINE 1.10 hr.		
02/02/20	Meetings with Mr. Hibsher, Ms. Goldman, Mr. Harrison, and Mr. Girdner and prepare for trial of case;		
	C.M. SHUMADINE 5.00 hr.		
02/03/20	Meetings with Mr. Hibsher, et al., and second day of trial of case before Judge Morgan in the United States District Court;		
	C.M. SHUMADINE 7.60 hr.		
02/03/20	Continue to assist the trial team with technology to display electronic trial exhibits in courtroom and create additional callouts from transcripts;		
	N. MARTINEZ 6.70 hr.		
02/03/20	2/03/20 Attend trial in the United States District Court and read in deposition testimony of Ms. Elford;		
	P. YODER 6.90 hr.		
02/04/20	Meetings with Mr. Hibsher, et al., and third day of trial of case before Judge Morgan in the United States District Court;		
	C.M. SHUMADINE 7.90 hr.		
02/04/20	Continue to assist the trial team with technology to display electronic trial exhibits in the courtroom;		
	N. MARTINEZ 6.50 hr.		
02/05/20	Meetings with Mr. Hibsher, et al., and attend final argument and decision of the Court;		

	C.M. SHUMADINE	4.80 hr.	
02/05/20	Review information relating to the filing of a fee application;		
	C.M. SHUMADINE	0.50 hr.	
02/05/20	Continue to assist the trial team with technology to display electronic trial exhibits in the courtroom;		
	N. MARTINEZ	2.50 hr.	
02/06/20	Research re: attorneys' fees and email to Ms. Matteo-Boehm and review Eastern District cases re: standards for awarding attorneys' fees;		
	C.M. SHUMADINE	0.80 hr.	
02/07/20	Emails from and to Mr. Hibsher re: fee application and telephone conferences with local attorneys re: providing an opinion and review cases re: fees;		
	C.M. SHUMADINE	1.20 hr.	
02/07/20	Email from and to Mr. Hibsher re: extension;		
	C.M. SHUMADINE	0.20 hr.	
02/07/20	Telephone conference with Robert Tata re: his possible assistance in providing opinion regarding fee petition;		
	C.M. SHUMADINE	0.30 hr.	
02/07/20	Emails from and to Mr. Hibsher re: request for extension;		
	C.M. SHUMADINE	0.20 hr.	
02/07/20	Initial draft of request for extension and memorandum in support;		
	C.M. SHUMADINE	0.30 hr.	
02/07/20	Review case law re: fee awards and send a case from Judge Gibney and a newspaper article regarding that case to lead counsel;		
	C.M. SHUMADINE	0.40 hr.	

02/07/20	Email from Ms. Burnett and arrange for missing invoices to be provided to Ms. Matteo-Boehm;		
	C.M. SHUMADINE	0.20 hr.	
02/07/20	Review Department of Justice fee ap	oplication;	
	C.M. SHUMADINE	0.20 hr.	
02/08/20		r. Hibsher re: need to continue to follow up with eys re: fees and re: testimony concerning the less of fees;	
	C.M. SHUMADINE	0.10 hr.	
02/08/20	Revise draft motion for extension and memorandum in support;		
	C.M. SHUMADINE	0.20 hr.	
02/10/20	Email from Mr. Hibsher and revise motion for extension and memorandum in support;		
	C.M. SHUMADINE	0.20 hr.	
02/10/20	Email drafts to Mr. Prince with explanation;		
	C.M. SHUMADINE	0.10 hr.	
02/10/20	Review email from Ms. Goldman to Mr. Tata with attachments and analyze issues regarding Mr. Tata's testimony;		
	C.M. SHUMADINE	0.70 hr.	
02/10/20 Email to and from Mr. Hibsher re: issues in billin statements and questions whether particular matter will be claimed;			
	C.M. SHUMADINE	0.20 hr.	
02/10/20	Telephone conference with Mr. Prince's office re: approval of motion for extension;		
	C.M. SHUMADINE	0.10 hr.	
02/10/20	Telephone conference with Mr. Matlassistant re: obtaining approval for fi		

	C.M. SHUMADINE	0.10 hr.	
02/10/20	Emails to and from Mr. Hibsher re: issues with filing;		
	C.M. SHUMADINE	0.20 hr.	
02/10/20	Email Mr. Prince re: changes;		
	C.M. SHUMADINE	0.10 hr.	
02/10/20	Review email from Mr. Tata and co	email from Mr. Tata and consider questions raised;	
	C.M. SHUMADINE	0.10 hr.	
02/10/20	Final review of motion and memorandum requesting extension of time to file fee application;		
	C.M. SHUMADINE	0.10 hr.	
02/10/20	Review and revise drafts of motion for extension and memorandum in support and email to Mr. Hibsher;		
	C.M. SHUMADINE	0.20 hr.	
02/10/20	Revise the Consent Motion to Extend Time to File a Fee Application, Consent Order, and Memorandum in Support and file same through the ECF System in the United States District Court;		
	P. YODER	0.70 hr.	
02/11/20	Email from and to Mr. Hibsher re: question re: supplementa submissions to the Court;		
	C.M. SHUMADINE	0.10 hr.	
02/11/20	Emails to and from Mr. Hibsher re: issues regarding extension and analysis of how to proceed;		
	C.M. SHUMADINE	0.30 hr.	
02/12/20	Telephone conference with Mr. Hibs application;	sher re: issues in fee	
	C.M. SHUMADINE	0.20 hr.	

02/12/20	Telephone conference with Mr. Prince and joint call to Ms. Baxter's office re: motion for extension;	
	C.M. SHUMADINE	0.20 hr.
02/12/20	Continue preparation of Declaration and bills re: application for fees;	
	C.M. SHUMADINE	1.50 hr.
02/12/20	Message from Ms. Baxter and forward to Mr. Hibsher, et al., and to Mr. Prince re: Judge Morgan being aware of extension application;	
	C.M. SHUMADINE	0.10 hr.
02/13/20	Email from Mr. Hibsher and response re: sending draft today of information relating to recovery of Willcox & Savage fees;	
	C.M. SHUMADINE	0.40 hr.
02/13/20	Email to and from Mr. Hibsher re: bill of costs and reimbursable costs and review of reimbursable costs;	
	C.M. SHUMADINE	0.40 hr.
02/13/20	Redraft of Declaration and review of past declarations;	
	C.M. SHUMADINE	0.80 hr.
02/13/20	Research re: prior decisions in the Eastern District of Virginia re: attorneys' fees;	
	C.M. SHUMADINE	1.40 hr.
02/14/20	Review order granting extension;	
	C.M. SHUMADINE	0.10 hr.
02/19/20	Email from and to Mr. Hibsher re: information to be provided to Bob Tata;	
	C.M. SHUMADINE	0.10 hr.
02/19/20	Review drafts and send to Mr. Tata;	

	C.M. SHUMADINE	0.50 hr.
02/19/20	Telephone conference with Mr. Tata re: declaration and fees claimed;	
	C.M. SHUMADINE	0.30 hr.
02/21/20	Email from Mr. Harrison re: reimbu expenses and email to Mr. Harrison;	rsable costs and
	C.M. SHUMADINE	0.20 hr.
02/22/20	Review Judge Morgan's opinion;	
	C.M. SHUMADINE	0.50 hr.
02/24/20	Email from Ms. Goldman and review prior cases re: Matheson's request for csv files and response to Ms. Goldman;	
	C.M. SHUMADINE	0.50 hr.
02/25/20	Additional research re: Eastern District practice and email from co-counsel in another case and email to Mr. Hibsher, et al., re: no requirement for applying the discovery rule to fee applications producing machine readable information;	
	C.M. SHUMADINE	0.50 hr.
02/25/20	Additional emails from class action attorney in another case re: no requirement for machine readable documents;	
	C.M. SHUMADINE	0.20 hr.
02/27/20	Review draft Declarations of William Hibsher and Rachel Matteo-Boehm to be submitted in fee application;	
	C.M. SHUMADINE	1.20 hr.
02/27/20	Review draft Declaration of Bob Tata for submission in fee application;	
	C.M. SHUMADINE	0.80 hr.

# **February 2020 Summary of Fees**

	<u>Hours</u>	Rate/Hr	<u>Amount</u>
C.M. SHUMADINE	46.30	450.00	20,835.00
P. YODER	7.6	160.00	1,216.00
N. MARTINEZ	<u>15.70</u>	215.00	3,375.50
TOTAL	69.60		\$25,426.50

**February 2020 Fees for Professional Services** 

**\$ 25,426.50** 

TOTAL FEES \$149,019.00